

## EXECUTIVE SUMMARY

The City of North Little Rock, Arkansas is required by law every five years to prepare a Consolidated Plan to receive federal funds from the U.S. Department of Housing and Urban Development (HUD). The City of North Little Rock's 2011-2015 Consolidated Plan was prepared in accordance with 24 CFR Sections 91.100 through 91.230 of the U.S. Department of Housing and Urban Development's Consolidated Plan regulations. The Consolidated Plan combines in one report important information about the City of North Little Rock's demographics and economic activity as well as detailed information on the housing and economic needs of its low- to moderate-income residents. The Consolidated Plan ties HUD grant-funded spending to other funding initiatives in the city that benefit low- and moderate-income residents. The Consolidated Plan also includes citizen feedback received during comment periods, public hearings, and stakeholder meetings.

All funding recommendations for programs operated with these funds were evaluated based on their ability to help the City meet the goals and priorities in this Plan.

For each succeeding year, the City of North Little Rock is required to prepare a one-year Action Plan to notify citizens and HUD of the City's intended actions during that particular fiscal year. The City of North Little Rock's Annual Action Plan fiscal year runs from January 1 through December 31 of each year. The Action Plan includes citizen and stakeholder input and is due annually to HUD by November 15. The Action Plan is developed under HUD guidelines and serves as the application for the following two formula grant programs:

- Community Development Block Grant (CDBG)
- HOME Investment Partnerships (HOME)

In addition, in 2010 the City of North Little Rock was awarded two competitive funding grants:

- NSP1 – Funded through the Arkansas Department of Finance Authority (ADFA) in the amount of \$2,003,503
- NSP2 – Funded through HUD in the amount of \$6,444,347

The City of North Little Rock will meet its HOME Match requirements through the partnership with its CHDO and nonprofit organizations such as Habitat for Humanity.

The City of North Little Rock chooses to include all funding sources in its HUD planning documents in order to provide the public a comprehensive view of its efforts to create affordable housing and job opportunities for low- to moderate-income residents.

The North Little Rock community and North Little Rock City Council also allocate local funds to support these important initiatives.

At the end of each fiscal year, the City must also prepare a Consolidated Annual Performance and Evaluation Report (CAPER) to provide information to HUD and citizens about that year's accomplishments. This information allows HUD, city officials, and the public to evaluate the City's performance and determine whether the activities undertaken during the fiscal year helped to meet the City's five-year goals and to address priority needs identified in the Consolidated Plan. This annual performance report, prepared with public review and comment, must be submitted to HUD annually by March 31 each year.

### **Consultation and Citizen Participation**

The Citizen participation Plan (CPP) is amended as included in the 2011-2015 Consolidated Plan. The CPP provides details for public notice for all meetings and the various stages of Consolidated Plan development, public hearings before the citizens of North Little Rock and City Council, accommodations for persons with disabilities, and the conduct of public review of proposed documents.

In addition to public hearings to receive comment from the citizens of North Little Rock and City Council, City staff held community meetings to provide citizens with information concerning the availability of Community Development Block Grant and HOME funds and to incorporate their comments into the planning process. These included three public hearings held at accessible locations located in our target area. Additionally, nonprofit organizations who serve low- and moderate-income persons were also notified of the public hearings dates. Printed notices of the public hearings were published in the newspaper, posted on the city's website, and made public at various public facilities.

A survey to establish a community involvement process for prioritizing needs was distributed among community groups, organizations, residents and posted on the City's website. Additional interviews were conducted with representatives of the housing and banking industry, non-profit organizations, and the community to further explore community needs and concerns.

### **Housing Market Analysis**

According to the 2000 U.S. Census, the population of North Little Rock was 59,913 and rose to 60,433 in 2009. The City's housing inventory rose from 27,567 units in 2000 to 29,932 housing units in 2010, an increase of 7.5% from 2000. Homeownership rose from 48.49% in 2000 to 57.8% in 2010. According to the 2008 American Community Survey, approximately 22,203 housing units in the City of North Little Rock were built before 1980.

The median gross rent for renter-occupied housing units on structures build since 1980 is \$757. On units built 2005 or later, the median gross rent is \$840.

## **Housing and Homeless Needs Assessment**

The Housing and Homeless Needs Assessment summarizes the available data on the current need for housing assistance for low, moderate, and other income households. According to the CHAS data, 73 percent of extremely low-income households, those earning less than 30 percent of the Median Family Income (MFI), pay more than 30 percent of their income on housing expenses and 57.5 percent pay more than 50 percent.

The North Little Rock Housing Authority administers the public housing in North Little Rock. In 2009, the Housing Authority reported a total of 240 households on waiting lists for assisted housing. The Housing Choice Voucher Program (HCVP) waiting list was opened in August 2010 for the first time in more than two years. Over 1200 applications were received and are currently under evaluation for placement on the waiting list.

Data from the Continuum of Care indicate that housing is needed for individuals and families who are homeless. Through the Point-in-Time Count on January 27, 2009, the Continuum counted 349 persons as sheltered and served by a number of organizations and 452 found to be unsheltered and living on the street. An additionally 624 homeless were living in transitional housing.

## **Strategic Plan**

The Strategic Plan provides a framework for addressing the needs identified in the Housing Market Analysis and the Housing and Homeless Needs Assessment. The Plan details the priorities assigned to the various types of services eligible for Community Development Block Grant funding and estimates the cost of meeting those needs. With each major area of concern, Housing, Homelessness, Other Special Needs, Non-Housing Community Development, Barriers to Affordable Housing, Anti-Poverty Strategy, Lead-Based Paint, Institutional Structure, and Coordination, there are goals, objectives, and strategies established to move the City of North Little Rock toward meeting the needs identified.

Key components of the Plan are:

- Needs assessment.
- Strategic goals.
- Delivery system.
- Accountability and performance measurements.

Primary categories of need that are addressed in the Plan are:

- Infrastructure development.
- Housing.
- Public services to special needs populations.
- Economic Development.

In many of the categories, grantees are asked to describe the basis for assigning the priority give to each category of priority needs. The priorities presented were developed by:

- Weighing the severity of the need among all groups and subgroups in the City.
- Analyzing the current social, economic and housing conditions.
- Analyzing the relative needs of low- and moderate-income families.
- Assessing the resources likely to be available over the next five years.

Priorities are relative and follow these classifications:

- High: The City plans to use available Consolidated Plan funds for activities to meet the need during the Five-Year Strategic Plan period.
- Medium: The City plans to use any available funds, including Consolidated Plan funds, for activities to meet the need during the Five-Year Strategic Plan period, and can assist organizations in seeking funds to meet the need.
- Low: The City does not envision using any available Consolidated Plan funds for activities to meet the need during the Five-Year Strategic period.

These goals, objectives and strategies are listed below, by area of concern.

## **Homelessness**

**Goal:** Expand housing and services offered to homeless families and individuals in North Little Rock.

**Objective 1:** Work with non-profit organizations to assist them in their fundraising efforts.

**Strategy 1.1:** Support non-profit efforts to expand their public or private funding sources through letters of consistency with the Consolidated Plan.

**Objective 2:** Support permanent supportive housing units available to special needs populations.

**Strategy 2.1:** Work with non-profit organizations and other providers to develop additional permanent supportive housing units.

**Objective 3:** Expand services provided to homeless families and individuals.

**Strategy 3.1:** Provide funding to non-profits who serve the homeless or persons at risk of being homeless by making capital improvements to their facility or providing equipment so they can be better served.

### **Other Special Needs**

**Goal:** Evaluate upcoming needs related to the non-homeless special needs populations.

**Strategy:** 1.1: Work with local providers to identify the needs of the non-homeless special needs population.

### **Housing**

**Goal:** Improve the condition and availability of affordable housing in North Little Rock.

**Objective 1:** Improve the condition of housing for low-income homeowners.

**Strategy 1.1:** Provide emergency repairs to the elderly and/or disabled adults with urgent repair needs.

**Strategy 1.2:** Provide funding for major rehabilitation projects for low-income homeowners.

**Strategy 1.3:** Provide downpayment assistance to first time low-income homebuyers.

**Strategy 1.4:** Support alternative housing assistance efforts such as faith based initiatives, volunteer housing assistance programs, self help initiatives and neighborhood empowerment programs.

**Objective 2:** Increase the number of new homes available on the affordable housing market in North Little Rock.

**Strategy 2.1:** Provide downpayment assistance to first time eligible homebuyers and subsidies to low-income homebuyers on new construction projects with an emphasis on green building.

**Objective 3:** Support the increase in the supply of housing available to low-income renters.

**Strategy 3.1:** Work with apartment development companies to identify opportunities to utilize Low-Income Housing Tax Credits (LIHTC) to build new apartments for low-income households.

## **Non-Housing Community Development**

**Goal:** Improve living conditions in North Little Rock by addressing non-housing community development needs.

**Objective 1:** Improve neighborhood conditions.

**Strategy 1.1:** Preserve neighborhoods through infrastructure improvements in the low-income areas of the City.

**Strategy 1.2:** Provide public service activities to city youth, seniors, special needs persons, persons and families in crisis, and disabled persons through supporting nonprofit organizations.

**Strategy 1.3:** Improving safety and livability of neighborhoods.

**Strategy 1.4:** Encouraging healthy living or lifestyles by promoting a healthier environment for residents in North Little Rock.

**Objective 2:** Expand job development efforts by supporting economic development projects.

**Strategy 2.1:** Support the training and education for better employment.

## **Barriers to Affordable Housing**

**Goal:** Address barriers to affordable housing development and availability in order to reduce the cost burden on low- and moderate-income residents.

**Objective 1:** Improve the housing stock in declining and/or unstable neighborhoods.

**Strategy 1.1:** The City will allocate 50 percent of its HOME's funds to its CHDOs to build new affordable green houses and/or provide subsidies.

**Strategy 1.2:** Provide downpayment assistance to first time homebuyers.

**Strategy 1.3:** Support of for-profit and nonprofit developers in the construction of Tax Credit assisted rental housing for families and seniors.

**Strategy 1.4:** Provide CDBG and HOME funds for the preservation of existing affordable owner-occupied housing.

**Strategy 1.5:** Continue to apply for other federal funds allocated to promote affordable housing.

### **Lead-Based Paint Hazards**

**Goal:** Increase the inventory of lead safe housing units.

**Objective 1:** Eliminate lead-paint hazards in housing.

**Strategy 1.1:** Continue to meet HUD lead-based paint standards in housing rehabilitation programs.

**Strategy 1.2:** Evaluate the Lead-based Paint Hazard Control Grant Program for possible development of a funding application by the City of North Little Rock.

**Strategy 1.3:** Expand the stock of lead safe housing units through continuation of the rehabilitation program and other new home construction efforts.

### **Anti-poverty Strategy**

**Goal 1:** Expand employment opportunities and workforce capacity in North Little Rock.

**Strategy 1.1:** Continue to support workforce development programs that train workers for positions that are made available through economic development efforts.

**Strategy 1.2:** Promoting economic development – especially job intensive industries.

**Strategy 1.3:** Continue to support job skills training.

**Goal 2:** Increase educational opportunities for children from low-income families.

**Strategy 1.1:** Provide funding for after school programs for children.

**Strategy 1.2:** Provide funding in support of capital improvements for non-profit organizations that provide after-school programs to low-income households.

**Goal 3:** Expand low-cost housing opportunities for lower-income families.

**Strategy 1.1:** The North Little Rock Housing Authority should continue to work with landlords to identify housing opportunities for Section 8 recipients.

**Strategy 1.2:** Work with apartment developers to identify opportunities for the use of Low-Income Housing Tax Credits in the development of apartment units for lower-income households.

**Strategy 1.3:** Encourage the North Little Rock Housing Authority to continue with their self-sufficiency program.

## **Institutional Structure**

**Goal 1:** Identify and address gaps in the institutional structure for the implementation of the housing and community development plan.

**Strategy 1.1:** Support the North Little Rock Housing Authority in its program initiatives and work with them to identify opportunities to expand programs and services.

**Strategy 1.2:** Work with private industry to address important issues that hamper housing and community development efforts.

**Strategy 1.3:** Continue the partnerships among public and private sector organizations.

## **Coordination**

**Goal 1:** Improve coordination between the City and other agencies and organizations committed to the improvement of housing and community development services in North Little Rock.

**Strategy 1.1:** Maintain participation in the Central Arkansas Team Care of the Homeless (CATCH) Continuum of Care, Argenta Downtown Council, Argenta Community Development Corporation and other entities.

**Strategy 1.2:** Continue working in a cooperative spirit with the North Little Rock Housing Authority, Pulaski County and surrounding cities.



## **SUMMARY OF GOALS AND OUTCOME EXPECTATIONS**

The City of North Little Rock's Consolidated Plan includes measures of performance to quantify longer-term goals by incorporating projected outcome measures. Quantifiable results-oriented goals for capital programs are tied to a unified framework for the benefit of low-and moderate-income residents.

- Preserve neighborhoods through infrastructure improvements in the targeted low-income area(s);
- Provide public services based on qualifications to special needs populations;
- Preserve neighborhoods through housing rehabilitation assistance to qualified homeowners;
- Preserve habitability of owner-occupied housing through emergency home repair assistance;
- Increase homeownership through downpayment assistance;
- Preserve affordability of quality rental housing through the Housing Choice Voucher program;
- Provide public service activities to city youth, seniors, special needs persons, persons and families in crisis, and disabled persons through nonprofit agencies or other city departments;
- Promote economic development activities;
- Create neighborhood or pocket parks in our target areas;
- Support emergency shelters for all homeless individuals and families;
- Provide neighborhood stabilization in the neighborhoods that are declining;
- Provide more opportunities to build and purchase affordable housing;
- Retaining the affordable housing stock;
- Improving the safety and livability of neighborhoods;
- Restoring and preserving properties of special historic, architectural or aesthetic value;
- Conserving energy resources and use of renewable energy sources;
- Supporting job creation and retention;
- Empowerment and self-sufficiency for low-income persons to reduce generational poverty in federally assisted housing and public housing;
- Encouraging healthy living by promoting a healthier environment for people;
- Support new and innovative housing concepts and trends;
- Support applications by our partners for other housing funding; and,
- Support annexation of additional areas for housing development.

The new long-term outcomes linked to these goals are:

- **Availability/Accessibility** – This outcome relates to programs that make services, housing, infrastructure, public services, or shelter accessible or available to low- to moderate-income persons, include those with special needs and/or disabilities.
- **Affordability** – This outcome relates to programs that provide affordability to low- to moderate-income persons and can include affordable housing.
- **Sustainability** – This outcome relates to programs that improve communities and promote viability such as removing slum and blight or other services that sustain communities.

### **Creating Suitable Living Environments: Availability/Accessibility**

As in the past, activities will be supported with HUD funds to improve access to public services that improve the living environment for low- and moderate-income persons.

Activities will:

- Provide opportunities for enrichment for low- and moderate-income youth, including at-risk youth, by encouraging leadership skills and providing after-school educational, recreational and mentoring opportunities to help youth participates develop the skills needed to achieve personal, educational and future employment success.
- Provide opportunities to maintain and enhance the quality of life for the City's senior, special needs and other low-income populations by providing nutritional meals, transportation services, recreational services, outreach and nutrition education.
- Provide access to health services, mental health counseling, nutrition services and quality health education that will support informed decisions in risk reduction behaviors for low- and moderate-income residents.

### **Providing Decent Affordable Housing: Availability/Accessibility**

Activities funded are expected to improve availability and accessibility of decent, safe and sanitary housing.

Activities are expected to:

- Improve the quality of and accessibility to decent, safe and sanitary housing for low- and moderate-income individuals and families and quality of life in low- and moderate-income neighborhoods through emergency and other home repairs, including code-related repairs, rehabilitation, lead hazard reduction and down payment assistance.
- Provide emergency repairs, weatherization services, and accessibility modifications for homeowners as well as handicap ramp construction for homeowners and renters.
- Provide housing information and support supportive services to help low- and moderate-income households that include persons with HIV/AIDS access decent housing.

### **Creating Economic Opportunities: Availability/Accessibility**

Projects supported by HUD funds are expected to provide availability and accessibility for the purpose of creating and retaining jobs and economic opportunities for low- and moderate-income residents.

Activities are expected to:

- Encourage commercial and industrial development.
- Improving our infrastructure for commercial and industrial development

### **Creating Suitable Living Environments: Affordability**

HUD funds are expected to support activities that assist individuals by improving affordability for the purpose of creating a suitable living environment.

### **Providing Decent Affordable Housing: Affordability**

HUD-funded activities are expected to help improve the affordability of decent housing through direct housing related services and/or the creation and rehabilitation of housing units. Activities are expected to:

- Result in the creation or rehabilitation of affordable-owner-occupied units for low- to moderate-income households.

- Help improve the affordability of decent housing by providing for education in fair housing laws.
- Provide down payments assistance to first time homebuyers.

### **Creating Suitable Living Environments: Sustainability**

Many of the activities carried out in Program Years 2011-2015 are expected to include features that contribute to the sustainability of the physical environment in North Little Rock's low- to moderate-income neighborhoods.

### **Providing Decent Housing: Sustainability**

HUD funds will assist activities that provide for the rehabilitation of owner-occupied properties. HUD funds are expected to assist with down payment assistance to first time homebuyers.

## **MISSION**

### **City of North Little Rock**

We want North Little Rock to be the most livable city in the country.

### **Mission of the Community Development Agency**

To provide housing, community and economic development services to benefit eligible residents so they have access to livable neighborhoods and have increased opportunities for self-sufficiency.

Federal law requires that housing and community development grant funds primarily benefit low- and moderate-income persons in accordance with the following U.S. Department of Housing and Urban Development (HUD) goals:

#### ***Provide a suitable living environment***

This includes improving the safety and livability of neighborhoods, increasing access to quality facilities and services, reducing the isolation of income groups within areas by de-concentrating housing opportunities and revitalizing deteriorating neighborhoods; restoring and preserving natural and physical features of special value for historic, architectural, or aesthetic reasons; and conserving energy resources.

***Provide decent housing***

Included within this broad goal are the following: assist homeless persons in obtaining affordable housing; retain the affordable housing stock; increase the availability of permanent housing that is affordable to low-moderate-income persons without discrimination; and increase supportive housing that includes structural features and services to enable persons with special needs to live in dignity.

***Expand economic opportunities***

These goals encompass creating jobs accessible to low- and very low-income persons.

**CITY OF NORTH LITTLE ROCK PROFILE**

The City of North Little Rock is located in the center of the State and on the north bank of the Arkansas River. The City is located at a major change in land forms as the southeastern half of the State is part of the Western Coastal Plain, Southern Mississippi Valley Alluvium and Silty Uplands. The original city formed as a river settlement and oldest portions of the City, the area south of I-40, is predominately river valley lands, much of this area designated as in the flood plain of the Arkansas River. The northern half of the city is upland geography and the soils are mostly fractured sandstone. This hilly area is the foothills of the Ouachita and Ozark Mountain ranges, the oldest ranges of mountains found in North America.

The City of North Little Rock is the 6<sup>th</sup> largest city in the state of Arkansas with a population of 60,433 according to the latest U.S. Census. North Little Rock is approximately 53½ square miles of total land area. The City is diverse, charming with affordable neighborhoods, beautiful lakes, outstanding parks and recreation facilities, and walking and bicycling trails along the Arkansas River.

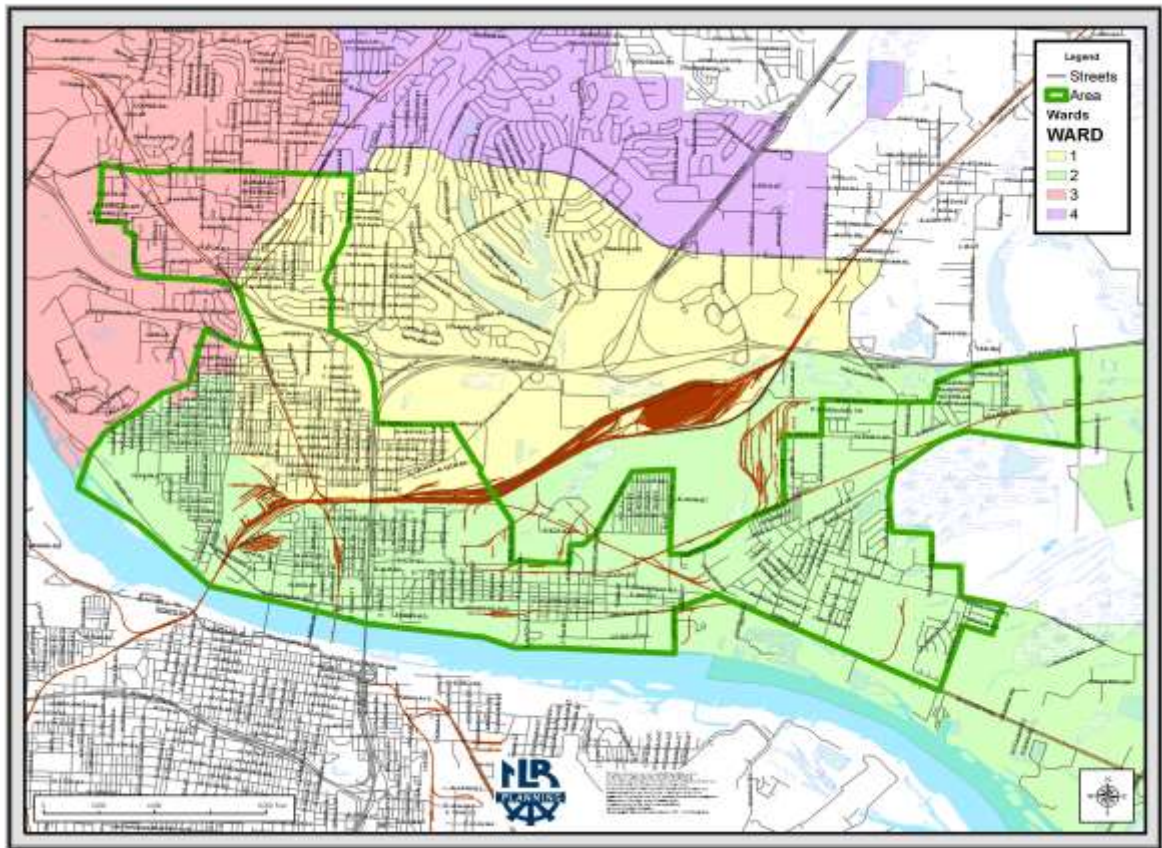
The City of North Little Rock has many attractions for its residents and visitors to see and enjoy such as: the Arkansas River Trail, a paved pedestrian and bicycle trail beginning at the City's downtown Junction Bridge along the Arkansas River through Emerald Park and Burns Park to Cook's Landing where it meets the "Big Damn Bridge" and crosses the Arkansas River where it connects to Little Rock; Burns Park is one of the largest municipal parks in the country with 1,700 acres consisting of a dog park, handicapped-accessible fishing pier and playground, camping area, 36-hole golf course, 36-hole disc golf course, baseball, BMX track, softball, soccer, a tennis center, multi-use trails, and a seasonal amusement park; the downtown areas of North Little Rock and Little Rock are linked by three-and-a-half miles of track for the beautiful and comfortable streetcars; and, Dickey-Stephens Park is the home of the Arkansas Travelers baseball team.

## CITY'S TARGET AREA

The City of North Little Rock's CDBG "Target Area" includes the area bound by Interstate 40 on the North, Fort Roots on the West, the Arkansas River on the South and the city limits on the East. The broader HOME "Target Area" is the same as the target area for CDBG funds, but each year the City will select a neighborhood or area within the broader "Target Area" for projects that year. The City plans to use their HOME funds to stabilize neighborhoods by concentrating its resources to smaller areas within the larger target area each year.

The City's target area map below shows the target area outlined in green.

**MAP1**  
**City of North Little Rock CDBG Target Area**



## EVALUATION OF PAST PERFORMANCE

The City reports on its progress towards goals set in the Consolidated Plan and Action Plan in the Consolidated Annual Performance and Evaluation Report (CAPER). The City has reported on all five years of our previous Five Year Consolidated Plan.

The City has already exceeded the cumulative housing and community development goals set in the fiscal year 2004-2009 Consolidated Plan by building new affordable houses, improving our infrastructure in our target area, increasing jobs in the downtown area of our City, supporting our nonprofit organizations who serve low- to moderate-income persons, supporting our Housing Authority, encouraging homeownership and improving our housing stock.

The City of North Little Rock has received approximately \$5.84 million from HUD in the two formula grants over the last 5 years. HUD determines the amount of money awarded according to a calculated formula using variables such as population and poverty level.

The City of North Little Rock began receiving Community Development Block Grant (CDBG) funds in 1975 and has continued to receive funds each year. CDBG provides communities with a flexible funding source for communities. Eligible uses include housing (not new construction), public facilities, economic development, and a limited amount of public services, with a 15 percent cap. CDBG funds must meet one of the three national objectives: (1) to service low- and moderate-income households; (2) eliminate slum and blight; (3) or meet an urgent need.

The City of North Little Rock has been receiving HOME Investment Partnership funds (HOME) since 1992. HOME funds have decreased over the past several years, resulting in significant cumulative decreases. Nevertheless, the City continues to make every effort in rebuilding neighborhoods and making them safer and more desirable places in which to live by aggressively seeking, preserving and using other forms of revitalization incentives: tax increment financing, federal and state historic tax credits, federal transportation funding, private grants, and a host of other programs. Overall the City continues to experience a revitalization that not only is improving the physical condition of City neighborhoods, but is also bringing people back into the City to live and work. HOME funds are eligible to fund acquisition, rehabilitation, new construction, down payment assistance, and tenant based rental assistance – with deeper affordability targets for rental for low- and moderate-income households.

## **Fair Housing**

The City completed its 2010 Analysis of Impediments (AI) to Fair Housing Choice which was adopted by the City Council. The 2010 Analysis of Impediments for the City identified some possible barriers to affirmatively furthering fair housing and, consequently, impediments to fair housing choice. These issues are as follows:

1. Historically, insufficient system capacity has resulted in:

- A. Inadequate outreach and education efforts that have led to:
  - i. Insufficient community awareness of fair housing;
  - ii. Insufficient understanding of what constitutes affirmatively furthering fair housing; and
  - iii. Inadequate understanding of the complaint process.
2. Rental markets in the City appear to demonstrate discriminatory actions by housing providers including:
  - A. Failure to make reasonable accommodation or modifications;
  - B. Discriminatory terms, conditions, privileges, services or facilities.
3. Disproportionately high home purchase loan denial rates exist for selected racial and ethnic minorities.
4. Home purchase loan denial rates are disproportionately high in lower-income areas.
5. Past land-use and development practices may not have been in the spirit of affirmatively furthering fair housing.

### **Suggested Actions to Consider**

In response to these listed impediments, the City of North Little Rock should consider taking the following actions:

1. Consider continuing participating in the Arkansas Community Development Association for efficient use of fair housing resources.
  - A. Contribute resources to a central pool to assist with funding fair housing activities.
  - B. Consider additional partners to include in the Association.
2. Increase knowledge and understanding of fair housing and affirmatively furthering fair housing through the following outreach and education efforts:
  - A. Offer meeting space and set up educational schedule for both consumers and providers of housing to be carried out by the Arkansas Fair Housing Commission (AFHC):
    - i. Assist in coordinating local delivery of educational services by AFHC to renters; and



- ii. Assist in coordinating local delivery of professional training services by AFHC to landlords, program managers, other rental housing providers.
  - B. Prominently display AFHC posters, flyers, and fair housing educational printed materials.
  - C. Distribute printed materials from the AFHC that present information regarding:
    - i. Definitions of reasonable accommodation and modification;
    - ii. Examples of discriminatory terms and conditions in rental markets; and
    - iii. Differences between affirmatively furthering fair housing, affordable housing production and preservation, and landlord/tenant rights and responsibilities.
  - D. Create improved referral system by distributing information about AFHC including how to file a complaint.
  - E. Request that the AFHC establish a Fair Housing Hotline for individuals to contact the AFHC and obtain immediate response to fair housing questions or concerns.
  - F. Request technical assistance from the State's Little Rock HUD office for outreach and education activities to target racial and ethnic minority housing consumers.
- 3. Establish baseline of the actual level and types of discrimination occurring in the community through audit testing activities:
  - A. Ask the AFHC to conduct, or conduct separately, a small sample of fair housing audit tests and record findings; this will again be done in five years to compare results.
    - i. For the City of North Little Rock, this is to include race and disability testing.
  - B. Request that the AFHC track complaint data more closely and use complaint data to compare year to year changes in fair housing activities.
    - i. While more complaints are likely to be filed if educational efforts are successful, the goal of this action is to decrease the *percentage* of

complaints that are found to be without cause and increase the percentage of those that are amicably reconciled. An additional goal is the decrease of the number of persons who abandon the complaint process without resolution.

4. Coordinate renter, homebuyer and homeowner credit trainings with local bankers and Realtors.
  - A. Enhance understanding of credit, what leads to poor credit and the attributes of predatory lending.
  - B. Enhance the understanding of poor real estate business practices, such as steering, redlining, and blockbusting.
5. Form local fair housing workgroup to meet periodically and address fair housing issues in the city. This group should be comprised of interested parties such as bankers, Realtors, property managers, fair housing advocates and representatives of the City.
  - A. Create and maintain database of contact information for this group and establish fair housing outreach e-mail distribution list.
  - B. Continue to conduct outreach and education efforts to demonstrate that land use policies aid in furthering fair housing.

#### **CONSULTATION PROCESS (91.100)**

1. *Lead Agency. Identify the lead agency or entity for overseeing the development of the plan and the major public and private agencies responsible for administering programs covered by the consolidated plan.*
2. *Identify the significant aspects of the process by which the plan was developed, and the agencies, groups, organizations, and others who participated in the process.*
3. *Describe the jurisdiction's consultations with housing, social service agencies, and other entities, including those focusing on services to children, elderly persons, persons with disabilities, persons with HIV/AIDS and their families, and homeless persons.*

## **LEAD AGENCY**

The Community Development Agency (CDA) is designated by the North Little Rock City Council as the single point of contact with HUD and lead agency for the administration of the CDBG and HOME grant programs.

As the single point of contact for HUD, CDA is responsible for developing the Five-Year Consolidated Plan, Annual Action Plan and the end-of-year Consolidated Annual Performance and Evaluation Report.

## **PARTICIPATING ORGANIZATIONS**

The City of North Little Rock has developed the Consolidated Plan with the input of several key city departments, county agencies, local nonprofit agencies and service organizations, community groups, boards and commissions, and citizens of North Little Rock.

To gather input from the citizens of North Little Rock, the city has adopted a Citizen Participation Plan that describes the citizens input process for the CDBG and HOME programs.

Significant steps in the planning process included:

- a) Creating a public participation plan to involve citizens of the City of North Little Rock.
- b) Establishment of needs assessment and priorities with other city departments.
- c) Conducting a survey with citizens of the city and city officials to determine high priorities needs.

The Five Year Housing Strategy outlined in this document is the result of a planning process conducted by the City's Community Development Agency that consisted of the following activities:

- A systematic analysis of demographic trends, community housing needs, and the supply/condition of the local housing stock. This analysis was prepared with research and data collection assistance from Metroplan, a council of local governments serving Central Arkansas;
- A realistic assessment of funds and staff capacity that will be available in the coming years to implement and administer housing-related programs, community development projects and activities, and economic development projects;

- Numerous meetings with community groups having an interest in the city's housing policy, community development and economic development both private and public organizations;
- Consulted with the North Little Rock Housing Authority and their five year plan for this community ;
- Consulted with River City Ministry, Recovery Centers of Arkansas, CareLink and other organizations to obtain information about the supportive services they provide to special needs populations;
- Consulted with Argenta Community Development Corporation, the City's approved CHDO, to obtain housing information for the people they serve; and,
- Prepared a Five Year Consolidated Plan Survey that was distributed to many nonprofit organizations, community leaders, residents, government officials requesting their opinions on the items in the Survey. The Survey was also listed on the City's website for anyone in the community to complete and send to the Community Development Agency.

#### **CITIZEN PARTICIPATION (91.105 AND 91.200)**

- 1. Provide a summary of the citizen participation process.*
- 2. Provide a summary of citizen comments or views on the plan.*
- 3. Provide a summary of efforts made to broaden public participation in the development of the consolidated plan, including outreach to minorities and non-English speaking persons, as well as persons with disabilities.*
- 4. Provide a written explanation of comments not accepted and the reasons why these comments were not accepted.*

Throughout the development of the Consolidated Plan, citizen input is encouraged. The City of North Little Rock provides its citizens many opportunities to provide input to the decision making process. Citizens are encouraged to attend and participate in City Council meetings, neighborhood meetings, charrettes held by the City, and CDBG and HOME public hearing meetings to solicit public input. These community engagement practices are

designed to meet the needs and requirements of various programs and planning processes.

In accordance with 24 CFR 91.115 (e), the Community Development staff developed a Citizen Participation Plan (CPP) designed specifically for the Consolidated Plan. The CPP describes city policies relating to public hearings, public notices, and comment period. The Five Year Consolidated Plan includes the amended Citizen Participation Plan which is included in appendix A.

To broaden public participation in the development of the Plan, the public hearings were held at accessible locations located in our target area. Additionally, nonprofit organizations who serve low- and moderate-income persons were also notified of the public hearings dates. Printed notices of the public hearings were published in the newspaper, advertised on the city's website, and made public at various public facilities.

At the beginning of 2010, the Community Development Agency developed a Five Year Consolidated Plan Survey. The purpose of the survey was to get feedback from the community about current housing and community development needs and services, economic development needs and to use the results to guide strategies for developing the City's 2011-2015 Consolidated Plan. See Appendix B for a copy of the Survey.

Our efforts to solicit input from the low- and moderate-income neighborhoods included holding our public hearings in those neighborhoods. Public hearings are accessible, sign language interpretation and non-English language were provided if requested.

## HOUSING MARKET ANALYSIS 91.210

### PUBLIC AND ASSISTED HOUSING (91.210(b))

1. *Describe the needs of public housing including the number of public housing units in the jurisdiction; the physical condition of such units; the restoration and revitalization needs of public housing projects within the jurisdiction; the number of families on public housing and tenant-based waiting lists; and, results from the Section 504 needs assessment of public housing projects located within its boundaries.*
2. *Describe the number and targeting (income level and type of household served) of units currently assisted by local, state, or federally funded programs, and an assessment of whether any such units are expected to be lost from the assisted housing inventory for any reason (i.e. expiration of Section 8 contracts).*

The North Little Rock Housing Authority's mission is to promote adequate and affordable housing, economic opportunity and a sustainable living environment free from discrimination. To demonstrate the seriousness of listening to the consumers of public housing, the Housing Authority voluntarily implemented a quarterly customer survey. In addition, the Housing Authority has appointed a resident to be a voting member of its Board of Commissioners. This was in accordance with HUD policy and has been in place for more than 10 years. This allows the Housing Authority tenants to have a direct voice on the Board for any policies developed. The survey provides uncensored feedback from tenant and enables the Housing Authority to address the specific needs and concerns of the tenants. With that tool and the results of reviews and feedback from HUD, the Housing Authority has persisted in improving administrative protocols, internal control systems, and operations management. The area most often impacting tenant's perception of a decent living environment is safety. Therefore, the Housing Authority continuously addresses the need to improve safety and security measures. Preventive actions taken include the installation of surveillance equipment and contracting with security companies for outside services. North Little Rock Housing Authority continues to partner with the North Little Rock Police Department wherein three officers are assigned to work specifically with Housing Authority sites.

To increase the availability of decent, safe, and affordable housing, the Housing Authority applied for and was approved for an additional 150 VASH vouchers since their last Plan. On average, the Housing Authority's occupancy rate ranges between 96 to 98 percent in both the Public Housing and Housing Choice Voucher Program (HCVP). The Housing Authority will continue to increase the availability of housing through acquiring and building units; renovating and modernizing current units; applying for vouchers when the opportunity arises; and, promoting self-sufficiency of assisted households to move them to homeownership or fair market housing.

One way of increasing assisted housing choices is that 100 percent of voucher holders are advised of mobility during briefing and transfer procedures. The Housing Authority's Homeownership Program is a flagship program that offers the choice of eventually owning a home. As of this date, 51 families have been assisted with purchasing a home. The Housing Authority maintained the payment standard at 90 percent – 100 percent of the FMR.

The North Little Rock Housing Authority has 1043 Low Income Housing Units and 1192 Housing Choice Vouchers under their management. In addition, they manage 150 VASH vouchers for homeless Veterans.

The Housing Authority's units were built between 1941 and the mid- 1990s and are considered in fair to good condition. All units have undergone major renovations throughout the years. Based on the age of the units, preventive maintenance as well as modernization is the key to avoiding wasteful spending on maintenance and repair of outdated designs and energy wasteful appliances. To that end, a physical needs assessment was conducted recently and observations are reviewed annually as part of the capital fund planning process.

There are 240 individuals on the public housing waiting list. The HCVP waiting list was opened in August 2010 for the first time in more than two years. Over 1200 applications were received and are currently under evaluation for placement on the waiting list.

In 2007, the Housing Authority conducted a Section 504 needs assessment. A result of the assessment, the Housing Authority created about 30 new units of physically accessible apartments and 23 apartments were modified with equipment for the hearing impaired. Site parking lots were updated to include compliant spaces and some common spaces were modified. In September 2010, the Department of Housing and Urban Development notified the North Little Rock Housing Authority that they were compliant with Section 504 requirements.

All of the Housing Authority's units are federally funded. The targeted income levels are families 30% or below the AMI and families at or below 50% of the AMI. Twenty units are expected to be demolished and lost from the public

housing inventory due to flooding in 2007. The plan is to redevelop the site within the next three years.

The North Little Rock Housing Authority has achieved the goal of High Performer status based on their HCVP SEMAP score.

## **HOUSING NEEDS (91.205)**

- 1. Describe the estimated housing needs projected for the next five year period for the following categories of persons: extremely low-income, low-income, moderate-income, and middle-income families, renters and owners, elderly persons, persons with disabilities, including persons with HIV/AIDS and their families, single persons, large families, public housing and Section \* tenant-based waiting list, and discuss specific housing problems, including: cost-burden, severe cost-burden, substandard housing, and overcrowding (especially large families).*
- 2. To the extent that any racial or ethnic group has a disproportionately greater need for any income category in comparison to the needs of that category as a whole, the jurisdiction must complete an assessment of that specific need. For this purpose, disproportionately greater need exists when the percentage of persons in a category of need who are members of a particular racial or ethnic group is at least ten percentage points higher than the percentage of persons in the category as a whole.*

The Department of Housing and Urban Development defines low- to moderate-income households as those with incomes below 80% of median income. By definition, HUD further defines extremely low-income (below 30% of median income), low-income (30% to 50% of median income) and moderate-income (households between 50% and 80% of median-income).

As is the City's practice, our housing needs were determined through a series of meetings, focus groups, a survey and a review of detailed information gained through the planning process. In addition, we reviewed our previous Consolidated Plan and information to better understand our current needs in

relation to historical information. We included our Planning Department, MetroPlan, HUD's website and our staff together with consultation with participants in the area of housing and community development in our process.



The City's housing inventory rose from 27,567 units in 2000 to 29,932 units in 2010. Our occupied units or households also rose from 25,542 in 2000 to 26,759 in 2010. Our population increased during the same time from 59,913 in 2000 to 60,433 in 2009. Our housing stock was built as follows according to 2010 estimates:

**TABLE 1**

Year Structure Built	Total Housing Units
Built Prior to 1939	1597
Built 1940 to 1950	2270
Built 1950 to 1960	4990
Built 1960 to 1970	6180
Built 1970 to 1980	6295
Built 1980 to 1990	3255
Built 1990 to 2000	945
Built 2000 to 2010	147

As we analyze these numbers in Table 1, we see that construction of housing units in our City has decreased sharply. The major portion of housing was built between 1950 and 1990. While this is the case for many cities across the nation, it still presents issues due to older housing stock that cannot keep up with the needs of 2010.

We are aware that our City has been partially "land locked" for a number of years. Our boundary of the Arkansas River on the south prohibits growth to the south. Sherwood, our sister city to the north, and Camp Robinson military base block growth to the north and Maumelle competes for land to our west. Previously, our growth to the east was hampered by low lands and farming. This has somewhat been alleviated by new growth around oxbow lakes to our east.

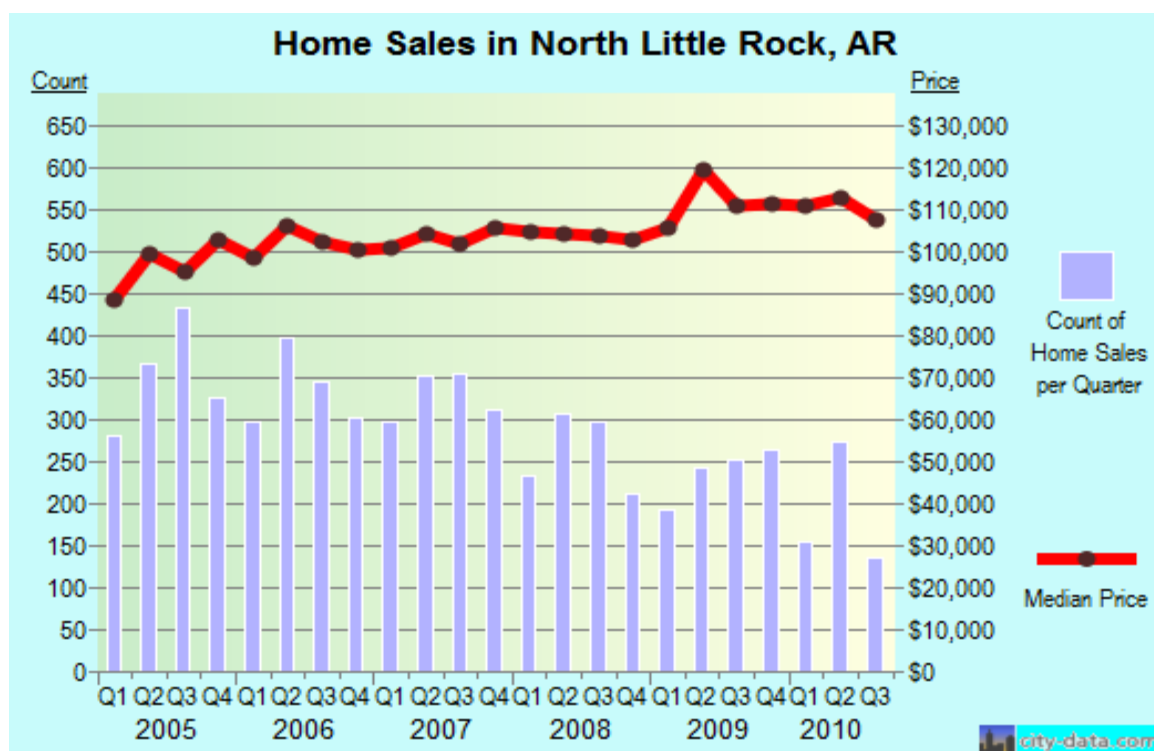
In addition to hampering our growth with the construction of new housing, this growth stagnation also causes concerns because existing housing is aging in place. As Table 1 above indicates, approximately 34% of our housing stock was built prior to 1960. There continues to be the need to upgrade existing housing stock and to undertake efforts at augmenting housing built in past decades to meet the housing needs of citizens today. Many times this leads to housing built as homeownership housing being utilized as rental housing.

Data demonstrates the need to rethink housing in general. Our efforts, throughout the 1990s and 2000s to reclaim older neighborhoods, have reaped some benefit. The downtown area and older neighborhoods are gaining interest and new units are being developed for the first time in recent memory. The City of North Little Rock was awarded NSP1 and NSP2 funds to stabilize the Baring Cross and Holt Neighborhoods. The City received \$2,003,503.00 of NSP1 funds

from the Arkansas Development and Finance Authority to build thirteen (13) affordable houses for households making no more than 120% of median income.

Additionally, the City and its consortium members which include Argenta Community Development Corporation, Habitat for Humanity and the North Little Rock Housing Authority received \$6,444,347.00 of NSP2 funds from the Department of Housing and Urban Development to build 100 units of housing. 25% of these houses have to be rented to households whose incomes are below 50% of area median income and the remaining houses can be sold or rented to households whose incomes do not exceed 120% of area median income, adjusted for family size. These two projects began in 2010 and should conclude construction by 2013.

**TABLE 2**



Source: City-Data.com

According to Table 2, home sales in the City of North Little Rock have decreased since 2008 and in the first and third quarter of 2010, the home sales dropped significantly. The median price of a home sold in North Little Rock in 2010 was approximately \$100,000.

Our City realizes that we must develop additional housing units for all ages and income groups in our City to compete in the years to come. New and innovative programs are being assessed. New developers and partners are being brought

into the fold to address this pressing issue. While we have many concepts and projects in the works, we still see the need to press forward for more housing.

Our Plan looks at detailed census information to determine our problems and issues as well as potential solutions to these problems and issues. Table 3 on the next page shows a breakdown in income by census tracts.

**TABLE 3**  
**Income Table by Census Tracts for the City of North Little Rock**

Income	Census Tracts								
	25	26	27	28	29	30	31	32.01	32.02
Less than \$10,000	192	111	323	501	207	817	66	314	218
\$10,000 to \$14,999	84	86	300	110	117	398	11	251	183
\$15,000 to \$19,999	36	75	272	81	70	330	7	193	207
\$20,000 to \$24,999	38	64	245	72	87	303	8	279	189
\$25,000 to \$29,999	19	68	247	73	76	228	0	269	193
\$30,000 to \$34,999	47	70	235	47	29	161	14	252	211
\$35,000 to \$39,999	28	33	212	31	38	213	8	243	196
\$40,000 to \$44,999	6	28	170	57	33	137	18	259	180
\$45,000 to \$49,999	73	25	105	0	13	84	17	264	135
\$50,000 to \$59,999	22	22	160	12	21	135	0	283	334
\$60,000 to \$74,999	24	8	187	33	4	83	19	170	379
\$75,000 to \$99,999	0	19	86	31	11	111	9	157	205
\$100,000 to \$124,999	0	0	39	2	15	49	0	31	117
\$125,000 to \$149,999	0	0	0	5	9	0	0	18	8
\$150,000 to \$199,999	0	0	0	11	5	0	0	9	0
\$200,000 or more	8	8	0	10	26	0	0	24	19
Totals	577	617	2701	1092	735	3049	177	2984	2766
Income	Census Tracts								
	33.01	33.03	33.04	37.01	37.03	38	39	43.02	43.03
Less than \$10,000	240	23	96	46	20	13	0	0	0
\$10,000 to \$14,999	248	64	135	33	0	7	0	0	4
\$15,000 to \$19,999	271	84	148	71	0	8	0	9	0
\$20,000 to \$24,999	278	129	165	41	22	0	0	0	0
\$25,000 to \$29,999	274	87	173	23	19	7	8	0	13
\$30,000 to \$34,999	247	70	101	60	38	10	0	0	0
\$35,000 to \$39,999	244	77	225	123	44	16	4	0	0
\$40,000 to \$44,999	222	126	249	85	34	0	17	0	0
\$45,000 to \$49,999	210	63	160	111	57	10	0	0	6
\$50,000 to \$59,999	371	263	397	163	58	3	16	0	25
\$60,000 to \$74,999	290	204	309	315	132	0	0	0	18
\$75,000 to \$99,999	273	287	321	238	55	7	7	0	45
\$100,000 to \$124,999	65	141	151	20	83	0	0	0	17
\$125,000 to \$149,999	42	102	127	72	33	0	0	0	0
\$150,000 to \$199,999	29	87	43	45	29	0	0	0	10
\$200,000 or more	30	95	46	37	7	0	0	0	7
Totals	3334	1902	2246	1733	631	81	52	9	145

While Table 3 above does not exactly track the exact percentages generally accepted, it does establish the need. Instead of using the standard definition of 30% for extremely low-income, the information provided uses 28% and respectively the 50% number for very low-income is 56% with the 80% number for low-income is 84%.

As noted in Table 3, a number of census tracts are heavily impacted by residents making less than \$10,000 per year. Table 3 notes that census tract 25 has 34% of its residents earning less than \$10,000 per year, census tract 26 has 18% of its residents earning less than \$10,000 per year, census tract 27 has 13% earning less than \$10,000 per year, census tract 28 has 45.8% of its residents earning less than \$10,000 per year. Census tract 28 block group 2 has an astounding 79.3% of its residents (302) earning less than poverty. Census tract 29 has 735 or 25% of its residents earning below \$10,000 per year, census tract 30 has 27% of its residents earning below \$10,000 per year, census tract 31 has 37.3% and census tract 32.01 is at 10.6% of its residents earning less than \$10,000 per year. The remaining census tracts have less than 10% of their residents below this threshold. Some census tracts have no residents earning less than this amount.

Citywide 3,235 households earn less than \$10,000 per year. With the median income for North Little Rock at \$37,605 it becomes obvious that a significant number of our households have residents that are living in difficult conditions. As utility costs, food and medical cost escalate, residents living conditions become much more tenuous at such a low income.

Another 3,927 residents earn less than \$19,999 per year. This category is the very low-income group in our city. Additionally, 3,775 households earn between \$20,000 and \$30,000 per year. This category goes to 84% of median income which would coincide with the low-income category.

Applying percentages to these figures, we see that 12.7% of our households fall into the extremely low-income category, 15.3% in the very low-income category and 14.7% into the low-income category. A full 42.8% of our households earn less than the median income in our city.

Realizing that the median income is \$37,605 and using the standard 30% of income for housing costs, a majority of our households have less than \$10,000 per year to utilize for housing expenses. With tight budgeting and careful spending this is not unreasonable for standard housing. However, with the same percentage applied to those residents in the extremely low-income range having less than \$3,000.00 per year for housing expenses or those at the very low-income range at less than \$6,000 per year for housing expenses, we can see the issues become extremely difficult for households to successfully sustain living in their homes.

The data also shows that these same census tracts where the predominance of very low-income households are located are also the areas where older homes are located and where there is a predominance of rental housing versus owner-occupied housing. Census tract 28 which has the lowest income levels with 79% extremely low-income and 94.2% below median income also has the largest percentage of renters. This was the case in previous reporting years as well.

The following Table 4 shows census tracts and the years housing was constructed in each census tract. A review highlights the concept mentioned above as to the impact of older housing and its part in the housing of lower income persons in our city.

**TABLE 4**

Census Tract # Block #	Total	Built 1999 To March 2000	Built 1995 to 1998	Built 1990 to 1994	Built 1980 to 1989	Built 1970 to 1979	Built 1960 to 1969	Built 1950 to 1959	Built 1940 to 1949	Built 1939 or earlier
25 (pt) /1(pt)	351	0	0	14	73	14	23	64	83	80
25 (pt) /2	281	12	0	0	7	0	3	49	77	133
27 (pt) /1	608	17	8	0	124	136	160	118	25	20
27 (pt) /2	455	0	0	0	9	155	160	88	27	16
27 (pt) /3	360	0	0	0	11	38	80	150	68	13
27(pt) /4	311	0	0	0	23	39	78	65	83	23
27 (pt) /5	381	0	0	0	13	16	38	139	148	27
27 (pt) /6	209	0	7	8	26	25	17	52	42	32
27 (pt) /7	366	0	9	0	16	143	100	83	7	8
27 (pt) /9	297	0	0	0	22	61	111	60	43	0
28/1	223	5	0	13	15	34	37	51	26	42
28/2	388	0	0	0	0	29	253	56	32	18
28/3	351	0	0	0	25	40	145	63	43	35
28/4	280	0	0	0	0	36	125	44	58	17
29/1	345	0	0	9	30	19	63	86	74	64
29/2	553	0	0	0	23	197	124	98	56	55
30 (pt) /1	1050	0	8	0	137	257	378	174	41	55
30 (pt) /2	309	0	0	0	0	0	85	102	74	48
30 (pt) /3	522	9	0	0	50	38	96	170	76	83
30 (pt) /4	350	0	10	0	26	46	77	75	68	46
30 (pt) /5	406	0	7	9	35	87	42	89	33	104
30 (pt) /6 (pt)	422	0	47	0	19	48	65	126	83	34
30 (pt) /7	296	0	0	9	7	80	85	66	42	7
31 (pt) /1 (pt)	177	0	0	36	43	78	11	9	0	0
32.01 (pt) /1	1104	9	26	110	176	329	259	149	36	10
32.01 (pt) /2	759	0	0	13	129	156	164	203	59	35
32.01(pt) / 3	542	0	10	25	16	86	205	164	27	9
32.01 (pt) /4	444	0	11	23	47	97	126	97	43	0
32.01 (pt) / 5	334	0	0	17	57	27	113	90	22	8
32.02/1	1924	19	82	33	270	918	395	159	21	27
32.02/2	417	0	17	0	33	8	102	160	97	0
32.02/3	562	0	22	0	65	60	114	164	70	67
33.01/1	719	16	95	59	247	259	16	19	8	0
33.01/2	722	0	19	33	112	317	193	33	8	7
33.01/3	670	0	0	37	9	158	217	159	64	26
33.01/4	478	0	14	0	7	64	140	175	53	25
33.01/5	369	0	0	0	31	22	100	111	48	57
33.01/6	575	0	6	0	30	81	71	60	157	170
33.03/1	658	0	0	0	6	77	353	198	18	6
33.03/2	345	0	30	55	12	171	58	19	0	0
33.03/3	970	16	45	154	205	477	47	13	6	7
33.04/1	812	17	19	33	106	188	188	253	8	0

CensusTract # Block #	Total	Built 1999 To March 2000	Built 1995 to 1998	Built 1990 to 1994	Built 1980 to 1989	Built 1970 to 1979	Built 1960 to 1969	Built 1950 to 1959	Built 1940 to 1949	Built 1939 or earlier
33.04/2	677	0	17	8	49	127	256	195	25	0
33.04/3	465	0	8	44	184	175	46	0	0	0
33.04/4	701	0	16	24	20	86	93	249	159	54
33.04/5	339	0	0	9	8	8	36	157	18	103
37.01 (pt) / 5	485	0	7	33	67	206	172	0	0	0
37.01 (pt) / 9 (pt)	1305	27	33	114	444	558	104	8	8	9
37.03 (pt) / 3 (pt)	75	0	0	0	59	16	0	0	0	0
37.03 (pt) / 5 (pt)	411	0	0	0	119	123	140	29	0	0
37.03 (pt) / 6 (pt)	138	0	0	9	0	57	72	0	0	0
39 (pt) / 2 (pt)	47	0	0	0	6	15	0	13	13	0
38 (pt) / 3 (pt)	76	0	0	14	7	13	10	25	0	7
39 (pt) / 1 (pt)	16	0	0	0	0	7	6	3	0	0
39 (pt) / 2(pt)	37	0	0	0	0	15	22	0	0	0
43.02 (pt) / 3 (pt)	13	0	0	0	0	0	5	8	0	0

As we look at these housing units, we clearly see that older housing stock generally follows a common path. Older homes quite often become rental units and these rental units are frequently in our older neighborhoods and disinvestment in neighborhoods leads to deterioration. We can see by the dates of houses constructed when economic times were more difficult. 1,597 units were built prior to 1940 and 2,270 units were built between 1940 and 1950. However, 4,990 units were built in the 1950's. We continued growth at a good pace up to 1990 when our housing development trailed off. Of course, we also lost population at that time as well.

In the mid 90s we realized our plight. Our City had essentially filled out and had no real growth areas. As Mayor Hays has often stated, "We need to put heads in beds". This simple philosophy focuses on two strategies: (1) creating new areas for development and, (2) rebuilding older and disenfranchised neighborhoods in our City. These efforts have at their core provision of affordable housing for our citizens.

We began an aggressive annexation program and since 2000 we have begun a focus on reclaiming neighborhoods. This effort has been focused in the areas of concentration of low-income persons in and near the central business district. We formed a group of partners to assist us in our efforts. Argenta Community Development Corporation, Sherman Park Community Development Corporation and Main Street Argenta partnered to increase citizen participation and input into



the process. Argenta CDC even expanded into the Holt neighborhood. With these partners, we aggressively focused efforts South of I-40, East of Fort Roots Memorial Drive, and along the corridor of East Broadway. This area mirrors the area of concentration of low- and moderate-income persons in our City.

Argenta Community Development Corporation (Argenta CDC) is a nonprofit organization in the City of North Little Rock whose mission is to improve the economic vitality, quality of life, and sense of community in targeted neighborhoods through the development of quality housing, the promotion of homeownership and the stimulation of economic growth. Argenta CDC's area of focus is as follows:

- Single-family and multi-family energy efficient housing development;
- Commercial property development;
- NeighborWorks® America Homeownership Center (homebuyer education, credit/financial counseling); and,
- Community development and organizing.

Currently, Argenta CDC's target area includes a 280-block region in downtown North Little Rock that is divided into two phases. Phase I Target Area is bound by the Arkansas River on the south, Pike Avenue on the west, Pershing Boulevard on the north, and I-30 on the east. The northern boundary is defined by some of the city's most historically significant housing stock. Phase II Target Area is from Pike Avenue west to Paul Duke Drive (aka Fort Roots Memorial Drive) and the Arkansas River north to 15<sup>th</sup> Street.

The population of the Phase I Target Area is 2,913 for the Argenta and Mid City census tract. The median household income is \$17,545 for this area. There are 1,522 housing units and 68 percent are renter occupied. Median house age is 54 years.

Argenta CDC seeks ways to include residents, corporations and government partners in their mission. They complement their core program areas by forming and engaging citizen action committees, promoting area businesses, sponsoring events and forums, and being a resource and mentor for other organizations who share their goal of rebuilding communities.

Since 2001, Argenta CDC has used components of its Argenta success as a blueprint in Baring Cross and Holt neighborhoods that mirror the decay that had overcome the Argenta area by newly constructing, renovating and selling 40 affordable homes, some of which have earned Gold LEED-H designation, the first homes in Arkansas to earn this distinction. In the next five years, Argenta CDC will continue their commitment with private and public partnerships utilizing funds in all three neighborhoods by committing at least \$15 million in urban planning, residential and commercial construction, infrastructure improvements, and economic development.

Argenta CDC's five year plan in housing is as follows:

- Continue construction and occupancy of a 150,000 square foot live/work development in downtown Argenta that will contain a 58 unit apartment complex and 8 units of light commercial space that will serve as an anchor in an emerging downtown district;
- Work with project partners to demolish, rehabilitate and newly construct at least 113 units of energy efficient housing for sale and rental in target neighborhoods with NSP I and NSP II funds.
- Strengthen two target communities by developing leadership in residents, promoting asset building, increasing housing opportunities, promoting youth development, and advancing workforce development and higher education. Efforts will be led by a neighborhood resource coordinator, a multi-year grant funded position.
- Acquire, rehabilitate and newly construct affordable housing for sale and rental in what is known as East Argenta..
- Continue to develop an individual development account program, a 3:1 matched savings program that will allow eligible low- to moderate-income residents in Pulaski County to purchase assets including a home, make home repairs, attend school, receive job training or start or expand a small business. Argenta CDC matches up to \$2,000 for individuals and up to \$4,000 for a household.
- Continue to service around 400 individuals each year with their homeownership center and facilitate \$6-7million in home loans to financial institutions each year.
- Work with the City of North Little Rock, Arkansas Children's Hospital, Department of Health and other potential partners to adopt a Healthy Homes initiative and legislation with a goal of receiving funding, such as HUD's Healthy Homes Grant for outreach and remediation of environmental health and safety concerns in target neighborhoods including mold, lead-based paint, allergens, asthma, carbon monoxide, home safety and pesticides.

In addition, the City also partnered with its local Housing Authority in its efforts to house low-income families and individuals. The North Little Rock Housing Authority is recognized as one of the most highly regarded authorities in the state and even the nation and recently was named by HUD as a high performer. Our belief is that a strong community must have a strong housing authority. We are both proud of and supportive of our partner, the North Little Rock Housing Authority. One of our main focuses is to both assist and depend on our local Housing Authority for assistance to residents below median income and to rely on them more specifically for persons in the very low and extremely low categories.

We gleaned from census information that 59.3% of our residents were members of families, 40.7% non-family households and 11.9% over 65 years of age which

is the traditional family having lost a spouse. The average household size is 2.26 members with the average family size just under 3 persons. One of the more interesting statistics is that slightly over 97% of our population is native to Arkansas.

As indicated in Table 5, it demonstrates 12.1% of our population earns less than \$10,000 per year, 7.7% earn between \$10,000 and \$14,999, 15.8% earn between \$15,000 and \$24,999, and 11.1% earn between \$25,000 and \$34,999 per year. Based on income information, over 45% of our population earn below 80% of area median income with 12.1% in the extremely low-income level, 23.5% in the very low-income group and the remainder of 11% in the median income group.

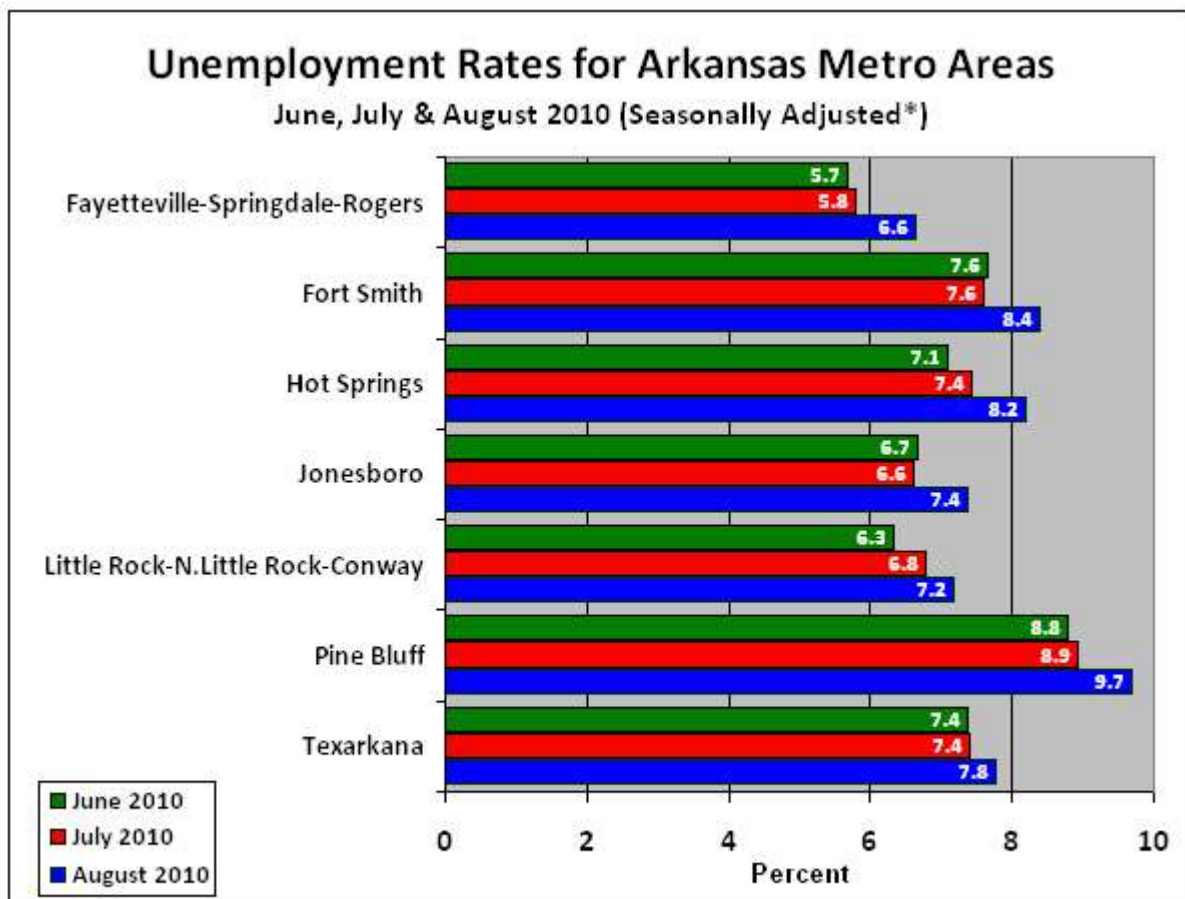
With an area median income of \$37,605 for our City, the threshold for low- and moderate-income falls somewhere in the low to mid \$30,000 range. With the threshold of low- and moderate-income persons clearly a large percentage of our population lives below poverty. In addition with 12% of our population and 8.3% of our families earning less than \$10,000 per year we see that many of our residents are living in difficult situations. As we view these numbers, we find our efforts in assisting and supporting housing programs for low, very low, and extremely low-income persons must continue. While housing assistance efforts of the past are applauded and housing efforts to produce more affordable and energy efficient housing are deemed essential, we realize fully that a gap remains between what we have produced and what is still needed.

**TABLE 5**

<b>INCOME RANGES FOR HOUSEHOLDS</b>	
<b>Income Ranges</b>	<b>Households</b>
<b>Total Households</b>	<b>25,461</b>
Less than \$10,000	12.1%
\$10,000 to \$14,999	7.7%
\$15,000 to \$24,999	15.8%
\$25,000 to \$34,999	11.1%
\$35,000 to \$49,999	16.6%
\$50,000 to \$74,999	18.0%
\$75,000 to \$99,999	8.2%
\$100,000 to \$149,999	6.7%
\$150,000 to \$199,999	1.6%
\$200,000 or more	2.2%
Median income (dollars)	37,605

Unemployment data for August, 2010 (not seasonally adjusted) showed that the unemployment rate ticked up by one-tenth of a percent in three of the state's MSAs, and was unchanged in the other four. However, August is typically a month in which the unemployment rate experiences a seasonal decline. Adjusting the data for this recurring seasonal pattern, the data show that unemployment rose substantially in each of the state's seven metro areas. For four of the seven metro areas, the increase in seasonally-adjusted unemployment in August follows an uptick in July as well.

**TABLE 6**



\*Data through 2009 are seasonally adjusted by the Institute for Economic Advancement using the Census X-12 ARIMA procedure. Data for 2010 are seasonally adjusted using 2009 seasonal factors.

Based on the chart above, unemployment remains high across the state of Arkansas. This chart shows a lower unemployment rate in Northwest Arkansas of 6.6% and a higher rate in Pine Bluff at 9.7%. The City of North Little Rock coupled with central Arkansas is at 7.2% rate of unemployment at the last reading. While the unemployment rate is high in all parts of the state, the data shows that our City while not having low unemployment is about average for the State of Arkansas in metro areas.

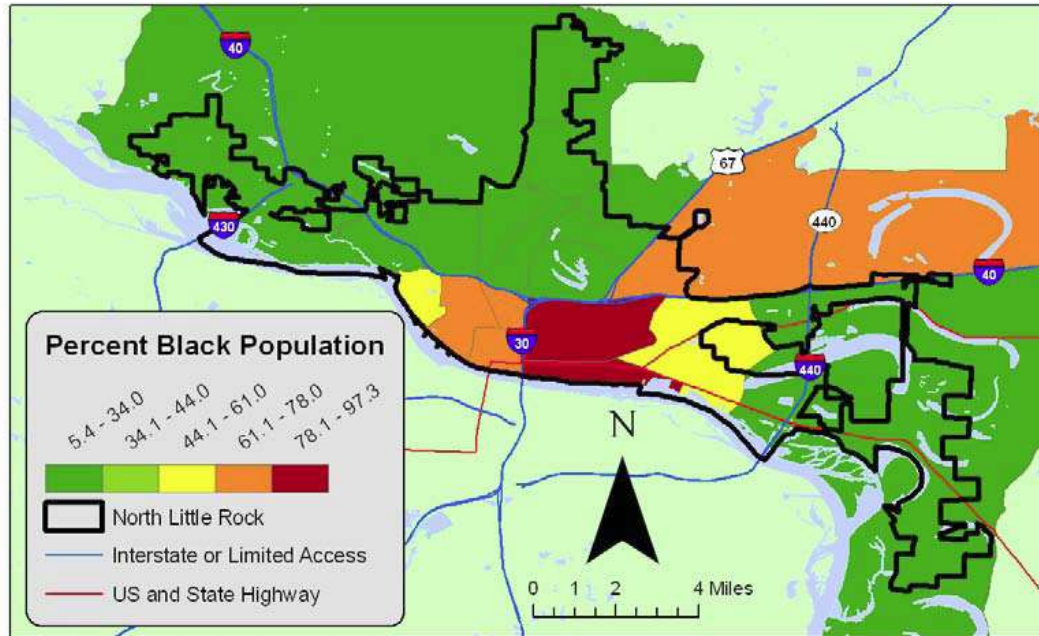
Our Chamber of Commerce actively engages in economic development. Our City funds the economic development arm of the Chamber of Commerce and works closely with all Chamber members to assure that we remain competitive for good paying jobs when available. Recently we recruited the Caterpillar plant to the City of North Little Rock that will provide good paying jobs at the top of the scale for our area. This effort is emblematic of efforts by the City partnering with the Chamber of Commerce. In addition, our community works closely with our community college to provide the best in education to assure that our residents are equipped to work in the jobs that are recruited by our Chamber of Commerce and our City.

Pulaski Technical College is one of the fastest growing colleges in our state and has a very diverse curriculum to provide a wide range of opportunities for its students. Recently, as the restaurant industry has increased in our area, Pulaski Tech expanded its culinary program to include additional courses in food management and food preparation. This past spring a local group featured a “challenge” for local chefs and one of Pulaski Tech’s chefs was in the final three contestants along with two noted and established chefs from local restaurants. This is just one example of Pulaski Tech’s benefit to our community.

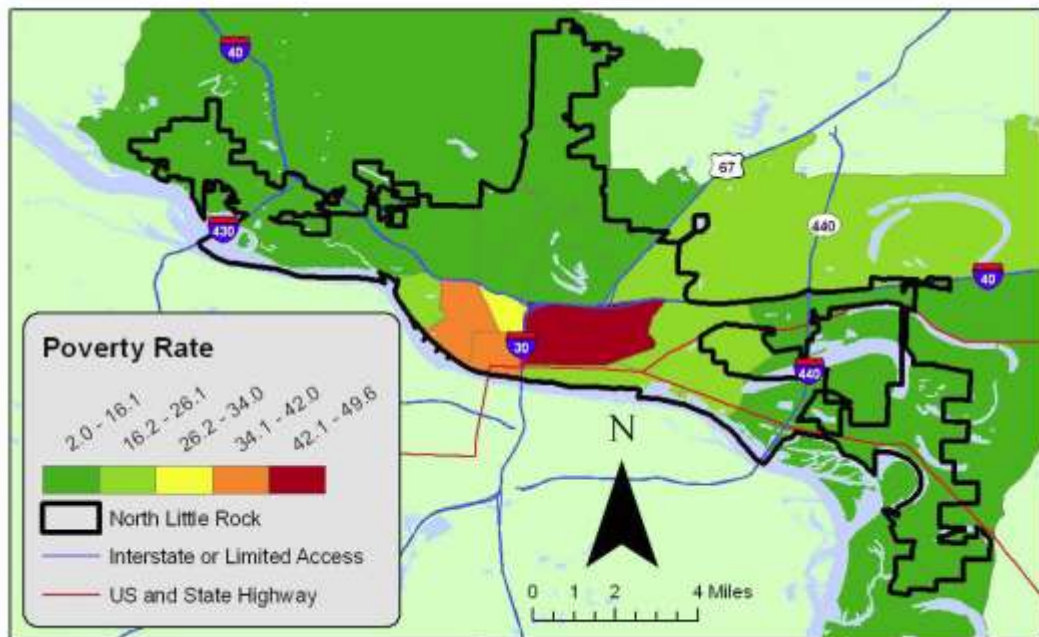
Data also shows the areas of low-income, heavily populated by black residents. This situation has remained constant throughout our evaluations of housing needs since we began the CHAS and Consolidated Plan process over 20 years ago. Data continues to show a greater need for black citizens as they continue to comprise the large percentage of low-income persons as well as a larger percentage of renters. The predominance of residents of the North Little Rock Housing Authority and persons receiving Section 8 rental assistance are minorities.

The maps on the following page reveal that the City’s black population is concentrated in the mid-central part of the City with the census tracts in that area having the highest percentages of low-income households.

**Map 2**  
**Percent Black Population by Census Tract**  
City of North Little Rock  
2000 Census Data



**Map 3**  
**Percent of Population in Poverty by Census Tract**  
City of North Little Rock  
2000 Census Data





These figures demonstrate that the need for housing assistance remains high in our City. Nearly 20% or approximately 5,000 families qualify for some sort of housing assistance.

<b>TABLE 7</b> <b>Percent of Income Spent on Housing</b> City of North Little Rock Census 2000 SF3 Data					
	<b>Less than 30.0%</b>	<b>31% - 50%</b>	<b>Above 50%</b>	<b>Not Computed</b>	<b>Total</b>
<b>Renter</b>					
Households	6,229	1,818	2,080	668	10,795
Percent	57.7%	16.8%	19.3%	6.2%	100.0%
<b>Owner With Mortgage</b>					
Households	6,748	1,241	666	54	8,709
Percent	77.5%	14.2%	7.6%	0.6%	100.0%
<b>Owner Without Mortgage</b>					
Households	4,543	194	218	45	5,000
Percent	90.9%	3.9%	4.4%	0.9%	100.0%
<b>Total</b>					
Households	17,520	3,253	2,964	767	24,504
Percent	71.5%	13.3%	12.1%	3.1%	100.0%

As Table 7 demonstrates, our residents continue to face the situation of cost overburden in housing costs. Renters remain most affected by this issue. 16.8% of our renters pay in excess of 30% of their income for rent with 19.3% paying above 50% of their income for rent. The obvious fact is households with little income and paying over 50% of their income toward rent meets the definition of cost over burden. By contrast, homeowners are paying far less percentage of their income for housing. 90% of homeowners without a mortgage pay less than 30% of their income for housing costs.

<b>TABLE 8</b> <b>Overcrowding and Severe Overcrowding</b> City of North Little Rock Census 2000 SF3 Data				
	<b>No Overcrowding</b>	<b>Overcrowding</b>	<b>Severe Overcrowding</b>	<b>Total</b>
<b>Owner</b>				
Households	5,429	150	70	5,649
Percent	96.1%	2.7%	1.2%	100.0%
<b>Renter</b>				
Households	4,010	279	119	4,408
Percent	91.0%	6.3%	2.7%	100.0%
<b>Total</b>				
Households	9,439	429	189	10,057
Percent	93.9%	4.3%	1.9%	100.0%

As we review overcrowding, we see a large percentage of our housing stock as being not overcrowded. Approximately 6% of our housing stock is believed to be

in an overcrowded situation, a total of 600 units. Of these, renters are twice as likely to be overcrowded as are homeowners. However, 220 owner-occupied units do remain overcrowded. The instance of severe overcrowding as a percentage of total population is at 1.9%. As we view Table 8, we remain committed to maintaining our stock of affordable housing and rental assisted housing. We also remain committed to attracting additional affordable housing. While our efforts have been successful in the past, it remains a priority to continue efforts at attracting housing developed with tax credits and other forms of assistance to help keep rents reasonable.

We remain committed to many of our diverse housing programs and partners that have been successful in the past. Much of what has been accomplished in the past 20 years in our housing efforts have been focused in two distinct areas but directed toward the concept “increasing both housing units and population and serving our existing and future population”.

Our local Housing Authority provides assistance with slightly over 1043 public housing units and 1192 housing choice vouchers plus an additional 150 VASH vouchers. This is a total of 2,385 units of assisted housing provided by the North Little Rock Housing Authority. In addition, our City has a number of tax credit units provided by private ownership and some private project based housing. It is estimated that over 500 units fall into this category. This leaves an underserved population of renters who most likely qualify for assistance that are not served by the resources available.

Our City has actively pursued housing development and has even partnered with our local Housing Authority, community development corporations and others to develop additional affordable housing units. Clearly, additional housing units are needed as some of our older housing stock continues to deteriorate and becomes no longer safe and decent housing as well as affordable to live in due to high utility bills and numerous needed repairs. These issues effect all income groups as our population increases.

In 2009, the City partnered with Argenta Community Development Corporation to apply to the Arkansas Development Finance Authority for NSP1 funds and were awarded \$2,003,503.00 to construct thirteen (13) affordable, green houses. Additionally, in 2009 the City partnered with Argenta Community Development Corporation, North Little Rock Housing Authority and Habitat for Humanity to apply for NSP2 funds from the Department of Housing and Urban Development and was awarded \$6,444,347.00 to purchase, rehabilitate or build new 100 affordable units. Some of these units will be rented to households making 50% or below the area median income. The remaining units will be sold to households making 120% or below the area median income. All these units are aimed toward the Baring Cross and Hold neighborhoods. This will serve as a



catalyst for future development along the Arkansas River and reaching northward to make a major improvement to our housing stock in two of our older neighborhoods. These funds will assist the City in stabilizing the Baring Cross and Holt neighborhoods and can be duplicated to other neighborhoods within the City as funds become available. Our goals include the continued use of these partners and programs as well as searching our new partners and programs.

The City receives HOME funds each year and awards 50% of those funds to their CHDOs to build affordable housing. Additionally, the City uses the remaining 50% of their HOME funds to rehabilitate exiting homes in our target area for those households who qualify for the HOME program.

### Persons with Disabilities

The information in Table 9 is from the United States Census Bureau and identifies 13,398 individuals in the City of North Little Rock with a disability, including 955 who are individuals under 15 years of age, 610 individuals between the ages of 16 to 20, 7,769 individuals between the ages of 21 to 64, and 4,064 individuals over the age of 65.

**TABLE 9**  
**Persons with Disabilities in the City of North Little Rock**

Male	Ages	One Type of Disability	Two or More Disabilities	Total Males with Disabilities
	5 to 15	410	207	617
	16 to 20	137	166	303
	21 to 64	1,862	1,869	3,731
	Over 65	692	812	1,504
	Totals By Category	3,101	3,054	6,155
Female	Ages	One Type of Disability	Two or More Disabilities	Total Females with Disabilities
	5 to 15	270	68	338
	16 to 20	194	113	307
	21 to 64	2,160	1,878	4,038
	Over 65	1,127	1,433	2,560
	Totals By Category	3,751	3,492	7,243
<b>TOTAL MALES AND FEMALES WITH ONE OR MORE DISABILITIES – 13,398</b>				

### Persons with HIV/AIDS

#### Housing Opportunities for Persons With AIDS (HOPWA)

One of Arkansas Department of Health's services is their HOPWA program. The purpose of the HOPWA Program is to provide states and localities with resources

and incentives to devise long-term strategies for meeting the housing needs of low-income persons living with HIV/AIDS and their families. This focus on providing housing assistance and related support services for HOPWA-eligible clients will reduce the risks of homelessness for this population and increase access to appropriate healthcare and other support.

The HOPWA Program serves low-income persons infected with HIV and their families whose incomes do not exceed 80% of the area median income for the area as determined by HUD.

The Arkansas Department of Health keeps statistics on the number of HIV/AIDS cases reported in the State of Arkansas. In Table 10 below it shows the number of cases reported to the Arkansas Department of Health for Pulaski County, Arkansas.

**TABLE 10**

PULASKI COUNTY			
HIV		AIDS	
1983 – 12/31/2009	01/01/2009 – 12/31/2009	1983 – 12/31/2009	01/01/2009 – 12/31/2009
2,461	108	1,456	45

## **STRATEGIC PLAN (91.215)**

### **PRIORITY NEEDS ANALYSIS AND STRATEGIES (91.215 (a))**

- 1. Describe the basis for assigning the priority given to each category of priority needs.*
- 2. Identify any obstacles to meeting underserved needs.*

### **Basis for Assigning Priorities**

The City of North Little Rock, as previously stated, has undertaken a number of efforts in addressing challenges regarding the needs of housing in our City. Drawing on those efforts in the past, we consider a number of factors and look at many sets of numbers and sets of data. We also rely on historical successes and shortcomings. Housing data has been retrieved from MetroPlan, our regional planning organization, census data and census estimates as well as our own internal information from our planning department and our Chamber of Commerce. All of this data has been taken into account, weighed, judged for

content and considered in our analysis. We strive to create a balance allowing our limited resources to be utilized effectively and to focus on addressing the most important needs.

As with any analysis of priorities, weights must be assigned based on factors the entity believes to be important. Our City has long been committed to utilizing both federal and local funds and other resources to assist those most in need of assistance. Occasionally, public safety and general public benefit influence the decisions but overall needs are addressed first in most occasions. Low- and moderate-income persons, poverty areas, areas of slum and blight and urgent need always rise to the top as priorities and this Plan is no exception.

As we review needs, we also take into account the well being of our City as a whole. We have come to believe that a healthy, vibrant, growing city has a direct and positive impact on its citizens. Ample choices of housing opportunities, educational opportunities and wholesome recreation and art venues all contribute to a well rounded city.

Priorities in our Plan include the normal upgrade of housing, streets and drainage improvements, economic development and public safety, but also at times are tempered with the need to create a vibrant downtown destination with public space and employment opportunities. As we identify needs we start with housing trends and needs. Our City's population changed from 2000 to 2009 in an up/down fashion. Our population in 2000 was 60,433. We lost population and in 2005 our population was estimated at 59,455. In 2009 our population estimate shows a gain and is back to 60,139. Outward migration and loss of population in our central city were significant factors in this migration.

An aggressive focus on our downtown and our City in general contributed to the growth. Since 2000, we have invested in a 17,000 seat multipurpose arena and a state of the art minor league baseball park both located downtown. We also invested in a 26-mile bicycle trail along the Arkansas River that we share with our sister city, a naval museum complete with a touring submarine, a state of the art senior citizens center, and we expanded our soccer fields located in our beautiful Burns Park to name just a few of the new developments. These amenities have spawned new developments including new restaurants, art galleries and shows, new retail space, a Community Theater, a branch of our library, a grocery store, a farmers market selling only Arkansas grown produce, housing growth downtown for the first time in over 20 years and a new burst of energy in our central business district.

**TABLE 11****Population Estimate for 2010  
City of North Little Rock**

	<b><u>Housing Units</u></b>	<b><u>Households</u></b>	<b><u>Household Population</u></b>	<b><u>Change in Housing Unites 00-10</u></b>
<b>2000</b>	27,567	25,542	59,913	
<b>2010</b>	29,932	26,759	60,476	2,365

	<b><u>Occupancy</u></b>	<b><u>Persons per Household</u></b>	<b><u>Group Quarters Population</u></b>	<b><u>Total Population</u></b>
<b>2000</b>	92.7%	2.35	520	60,433
<b>2010</b>	89.4%	2.26	520	60,853

HU Chg To 1/1/2010 (w/o 2009 Demos):	Est. 2009 demo units: (final count)	Net Unit change to 1/1/2010
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2,422	57	2,365
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ACS 06-08	PPH	Occ	Complied by
ACS 05-07	2.26	89.40%	MetroPlan
Trend	2.28	89.90%	12/1/2009
	2.34		Revised 2/26/2010

Aside from this modest increase in population in recent years we have added housing units as well. As indicated in Table 11, in 2000 our City had 27,567 housing units and in 2010 our City had 29,932 housing units – a gain of 2,365 units. Table 11 shows a reduction in both occupancy rate (down 3.3%) and a reduction in persons per household of almost a tenth of one percent. Of the additional 2,365 living units provided since 2000, 1550 were rental units.

Table 12 also shows the block group totals of housing units broken down by owner-occupied and rental-occupied structures by census tracts. Of note in this table is the fact that lower income census tracts also have higher percentages of

rental units while higher income census tracts have higher instances of owner-occupied structures. This is not different from previous reports and census data but it further demonstrates the need to focus resources in the older areas of our City.

**TABLE 12**  
**NLR Housing Units by Tract 2000 by Tenure**

<u>Tract*</u>	<u>Total:</u>	<u>Occupied:</u>	<u>Owner-occupied</u>	<u>Renter-occupied</u>
<b>25</b>	632	552	140	412
<b>26</b>	721	595	260	335
<b>27</b>	2,987	2,733	1,792	941
<b>28</b>	1,242	1,091	443	648
<b>29</b>	898	775	278	497
<b>30</b>	3,355	3,024	988	2,036
<b>31</b>	177	169	25	144
<b>32.01</b>	3,183	2,949	1,659	1,290
<b>32.02</b>	2,903	2,757	1,889	868
<b>33.01</b>	3,533	3,339	1,723	1,616
<b>33.03</b>	1,973	1,892	1,361	531
<b>33.04</b>	2,994	2,845	1,870	975
<b>37.01</b>	1,790	1,734	1,381	353
<b>37.03</b>	624	607	560	47
<b>38</b>	123	86	54	32
<b>39</b>	226	199	114	85
<b>43.02</b>	13	8	0	8
<b>43.03</b>	188	164	148	16
<b>Total</b>	<b>27,562</b>	<b>25,519</b>	<b>14,685</b>	<b>10,834</b>

\*Tract data depicts portion within NLR in year 2000 only.

Source: Census 2000, SF-3 data.

*Compiled by*  
*Metroplan*  
*7/12/2010*

**TABLE 13**

North Little Rock, Arkansas		
	Estimate	Margin of Error (+/-)
Total:	25,461	660
Owner-occupied	14,721	686
Renter-occupied	10,740	888

The breakdown of owners to renters in Table 13 demonstrates that 14,721 residential units were owner-occupied and 10,740 were renter-occupied. This almost mirrors the 2000 census information as slightly over 41% of our households were rental at that time and today the figure is just over 42%.

From this data we see that our previous strategy and our City's efforts to focus on shoring up the infrastructure, economic base, and housing and employment opportunities in the downtown area are still valid priorities.

**TABLE 14****Poverty Status in the Past 12 Months by Sex by Age**

	Estimate	Margin of Error (+/-)
Total:	57,343	2,291
Income in the past 12 months below poverty level:	12,125	2,041
Male:	5,398	1,021
Under 5 years	899	343
5 years	93	81
6 to 11 years	974	415
12 to 14 years	526	245
15 years	238	209
16 to 17 years	122	96
18 to 24 years	881	396
25 to 34 years	593	276
35 to 44 years	331	160
45 to 54 years	342	191
55 to 64 years	225	158
65 to 74 years	73	72
75 years and over	101	79
Female:	6,727	1,262
Under 5 years	586	298
5 years	101	106
6 to 11 years	634	364
12 to 14 years	414	241
15 years	159	119
16 to 17 years	82	81
18 to 24 years	991	446
25 to 34 years	1,094	384
35 to 44 years	936	352
45 to 54 years	582	238
55 to 64 years	545	229
65 to 74 years	254	153
75 years and over	349	169
Income in the past 12 months at or above poverty level:	45,218	2,264
Male:	21,393	1,443
Under 5 years	1,238	502
5 years	180	140
6 to 11 years	1,555	431
12 to 14 years	767	266
15 years	189	162
16 to 17 years	551	170
18 to 24 years	1,751	483
25 to 34 years	2,962	526
35 to 44 years	3,341	479
45 to 54 years	3,410	496
55 to 64 years	2,682	413
65 to 74 years	1,400	274
75 years and over	1,367	230
Female:	23,825	1,341
Under 5 years	1,384	355
5 years	306	249
6 to 11 years	1,123	358
12 to 14 years	703	268
15 years	434	197
16 to 17 years	412	198
18 to 24 years	1,503	340
25 to 34 years	2,658	498
35 to 44 years	2,966	482
45 to 54 years	4,478	444
55 to 64 years	3,435	426
65 to 74 years	1,902	270
75 years and over	2,521	354

Source: U.S. Census Bureau, 2006-2008 American Community Survey The margin of error can be interpreted roughly as providing a 90 percent probability that the interval defined by the estimate minus the margin of error and the estimate plus the margin of error (the lower and upper confidence bounds) contains the true value.

Table 14 shows that in the past 12 months that 12,125 persons were living below the poverty level. This is 21% of our population. As the chart indicates, 5,398 of those below the poverty level were males and 6,727 were females. This, of course, mirrors population statistics as we have more females than males residing in North Little Rock.

Those below poverty level are distributed all through the age groups. The numbers and groupings of those above poverty are dispersed throughout all age groups as well.

As we review the data, no significant conclusions can be drawn other than the number of poverty level persons. The only outstanding age groups in the chart are those below 5 years of age and the groups between 18-24 and 25-34. An obvious correlation is that a large number of children below 5 years of age are children of those in the two age groups noted. These are the child bearing age persons that are young adults entering the work force with entry level jobs.

Our efforts to support education of our population are geared toward this issue as creating a more qualified work force is the clearest path to provide these identified young families and their young children a way out of poverty. Of course, our assisted housing and affordable housing efforts also address this problem as well.

#### Conclusions:

From the data described in this section we find the following:

1. While our City has reversed the trend of population loss, we still must concentrate efforts on providing housing development. Coupled with development of market rate, affordable and assisted housing, we must continue our efforts at neighborhood initiatives and neighborhood revitalization.
2. With respect to older housing units, we must continue efforts at code enforcement as well as our housing programs geared toward upgrading and sustaining our older housing stock.
3. By census tract we find changes from owner-occupied housing to rental stock as having an impact on neighborhood vitality. Our efforts at promoting homeownership and neighborhood revitalization must be sustained.
4. With respect to poverty, we see our City has a large poverty level population. Efforts at sustaining and expanding affordable housing must continue. Along with these efforts, we also must continue to attract and



- secure new business ventures in our City thereby increasing the likelihood of our citizens securing good paying jobs. Coupled with this effort, we must continue to strengthen our educational opportunities to give our residents a better chance at more productive employment and a better opportunity at breaking the chain of poverty.
5. Our City also sees as a priority need that of addressing energy needs and consumption. Any reduction in energy use is seen as a win for all segments of our population as we both reduce the current monthly energy payment and reduce the scarcity of energy resources in the future.

The Strategic Plan provides an overview of goals and objectives to be pursued over the course of a five-year period from 2011 through 2015. Programs and processes that work toward the resolution of pressing housing issues within the City are the primary focus of the City of North Little Rock in its utilization of federal housing and community development program funds. The funding of public infrastructure projects in CDBG eligible census tracts will continue to be a City priority. Additionally, funding for non-housing community activities include capital improvement projects for agencies as well as providing funds for public service activities to non-profit organizations.

Listed below are the following goals, objectives and strategies for the different categories:

### **Homelessness**

**Goal:** Expand housing and services offered to homeless families and individuals in North Little Rock.

**Objective 1:** Work with non-profit organizations to assist them in the fundraising efforts.

**Strategy 1.1:** Support non-profit efforts to expand their public or private funding sources through letters of consistency with the Consolidated Plan.

**Objective 2:** Support permanent supportive housing units available to special needs populations.

**Strategy 2.1:** Work with non-profit organizations and other providers to develop additional permanent supportive housing units.

**Objective 3:** Expand services provided to homeless families and individuals.

**Strategy 3.1:** Provide funding to non-profits who serve the homeless or persons at risk of being homeless by making capital improvements to their facility or providing equipment so they can be better served.

## **Other Special Needs**

**Goal:** Evaluate upcoming needs related to the non-homeless special needs populations.

**Strategy:** 1.1: Work with local providers to identify the needs of the non-homeless special needs population.

## **Housing**

**Goal:** Improve the condition and availability of affordable housing in North Little Rock.

**Objective 1:** Improve the condition of housing for low-income homeowners.

**Strategy 1.1:** Provide emergency repairs to the elderly and/or disabled adults with urgent repair needs.

**Strategy 1.2:** Provide funding for major rehabilitation projects for low-income homeowners.

**Strategy 1.3:** Provide downpayment assistance to first time low-income homebuyers.

**Strategy 1.4:** Support alternative housing assistance efforts such as faith based initiatives, volunteer housing assistance programs, self help initiatives and neighborhood empowerment programs.

**Objective 2:** Increase the number of new homes available on the affordable housing market in North Little Rock.

**Strategy 2.1:** Provide downpayment assistance to first time eligible homebuyers and subsidies to low-income homebuyers on new construction projects with an emphasis on green building.

**Objective 3:** Support the increase in the supply of housing available to low-income renters.

**Strategy 3.1:** Work with apartment development companies to identify opportunities to utilize Low-Income Housing Tax Credits (LIHTC) to build new apartments for low-income households.

## **Non-Housing Community Development**

**Goal:** Improve living conditions in North Little Rock by addressing non-housing community development needs.

**Objective 1:** Improve neighborhood conditions.

**Strategy 1.1:** Preserve neighborhoods through infrastructure improvements in the low-income areas of the City.

**Strategy 1.2:** Provide public service activities to city youth, seniors, special needs persons, persons and families in crisis, and disabled persons through supporting nonprofit organizations.

**Strategy 1.3:** Improving safety and livability of neighborhoods.

**Strategy 1.4:** Encouraging healthy living or lifestyles by promoting a healthier environment for residents in North Little Rock.

**Objective 2:** Expand job development efforts by supporting economic development projects.

**Strategy 2.1:** Support the training and education for better employment.

## **Barriers to Affordable Housing**

**Goal:** Address barriers to affordable housing development and availability in order to reduce the cost burden on low- and moderate-income residents.

**Objective 1:** Improve the housing stock in declining and/or unstable neighborhoods.

**Strategy 1.1:** The City will allocate 50 percent of its HOME's funds to its CHDOs to build new affordable green houses.

**Strategy 1.2:** Provide downpayment assistance to first time homebuyers.

**Strategy 1.3:** Support of for-profit and nonprofit developers in the construction of Tax Credit assisted rental housing for families and seniors.

**Strategy 1.4:** Provide CDBG and HOME funds for the preservation of existing affordable owner-occupied housing.

**Strategy 1.5:** Continue to apply for other federal funds allocated to promote affordable housing.

## **Lead-Based Paint Hazards**

**Goal:** Increase the inventory of lead safe housing units.

**Objective 1:** Eliminate lead-paint hazards in housing.

**Strategy 1.1:** Continue to meet HUD lead-based paint standards in housing rehabilitation programs.

**Strategy 1.2:** Evaluate the Lead-based Paint Hazard Control Grant Program for possible development of a funding application by the City of North Little Rock.

**Strategy 1.3:** Expand the stock of lead safe housing units through continuation of the rehabilitation program and other new home construction efforts.

## **Anti-poverty Strategy**

**Goal 1:** Expand employment opportunities and workforce capacity in North Little Rock.

**Strategy 1.1:** Continue to support workforce development programs that train workers for positions that are made available through economic development efforts.

**Strategy 1.2:** Promoting economic development – especially job intensive industries.

**Strategy 1.3:** Continue to support job skills training.

**Goal 2:** Increase educational opportunities for children from low-income families.

**Strategy 1.1:** Provide funding for after school programs for children.

**Strategy 1.2:** Provide funding in support of capital improvements for non-profit organizations that provide after-school programs to low-income households.

**Goal 3:** Expand low-cost housing opportunities for lower-income families.

**Strategy 1.1:** The North Little Rock Housing Authority should continue to work with landlords to identify housing opportunities for Section 8 recipients.

**Strategy 1.2:** Work with apartment developers to identify opportunities for the use of Low-Income Housing Tax Credits in the development of apartment units for lower-income households.

**Strategy 1.3:** Encourage the North Little Rock Housing Authority to continue with their self-sufficiency program.

## **Institutional Structure**

**Goal 1:** Identify and address gaps in the institutional structure for the implementation of the housing and community development plan.

**Strategy 1.1:** Support the North Little Rock Housing Authority in its program initiatives and work with them to identify opportunities to expand programs and services.

**Strategy 1.2:** Work with private industry to address important issues that hamper housing and community development efforts.

**Strategy 1.3:** Continue the partnerships among public and private sector organizations.

## **Coordination**

**Goal 1:** Improve coordination between the City and other agencies and organizations committed to the improvement of housing and community development services in North Little Rock.

**Strategy 1.1:** Maintain participation in the Central Arkansas Team Care of the Homeless (CATCH) Continuum of Care, Argenta Downtown Council, Argenta Community Development Corporation and other entities.

**Strategy 1.2:** Continue working in a cooperative spirit with the North Little Rock Housing Authority, Pulaski County and surrounding cities.

## **Obstacles to Meet Underserved Needs**

There are two overriding obstacles to meeting underserved needs in our community. First, there is a lack of funding that we suggest will always be a part of any process to address needs and, secondly, is the lack of enough staff and time to fully analyze all data. There simply is not enough money to address all issues and there also is not enough staff to gather all information and analyze the issues in all situations.

This stated we are aware of our duty to utilize resources to address the needs identified and clearly the most pressing of those should be addressed first.

However, we also see that there are other obstacles that are clearly more pressing in our process that have a higher probability of being addressed. Proper analysis is important but having a system that remains flexible to change is paramount. Simply heading off in any direction is not a successful way to approach difficult issues.

In addition to flexibility, we must also make communication with our partners a priority. Even with funding in short supply, we must assure the precious dollars available are used wisely and that the direction of the use of those dollars is clearly described to those in the business of solving the same problems we are addressing. The nonprofit partners of our community, our business partners and any interested parties available must be invited to the table to assist in our effort. This process is an obstacle as schedules are hectic but, the effort must still be made.

While our City Administration has a clear vision of improvements to the housing, business and employment opportunities of our City, we must continue to make every effort to communicate this vision to our citizens and partners. In addition to our internal efforts with the funds described in this document, we have encouraged our partners to seek funding and resources to assist with our efforts. We provide numerous meeting forums and public meetings to assist our partners in being part of our process. Our staff also participates in functions held by our partners to assure that we remain focused on their issues as well.

Any address of needs and obstacles in our efforts must include funding. Our City continues to work diligently in attaining funding. A grant writing firm has been contracted by the City to assist any department in attaining grants for needed projects. This has been a successful tool but more assistance in this area is always needed. In addition or city has a grant writer on staff to push for funding sources for our City. This has been successful as well.

Our City is a leader in “green” energy and technology and energy savings. We are currently building a CNG station and converting our fleet of city vehicles to CNG in an effort to meet energy savings and clean energy goals. In this vein our City is also providing grants to individual residents for the purchase of energy efficient appliances. These efforts are utilized to help our citizens see the need for gaining energy independence and for purchasing more energy efficient appliances to save money on utilities and energy. The City’s Electric Department also provided funding to the Central Arkansas Development Council to assist North Little Rock residents with their electric bills.

Education of our citizens on issues such as wise use of energy, the need for better education, the need for clean energy, and the need for better housing and better employment remain obstacles. Like most other cities across the nation,

having our citizens “on board” with the City’s vision is a major obstacle. With open meetings, televised city council meetings, a public information channel, a generous public comment section of our City Council meetings and a number of “connections” to our government this still remains an obstacle.

Conclusions:

1. Obstacle number one will continue to be inadequate funding. While we will continue to search and apply for grants and funding sources, the need for funding still out paces our resources. These funds are essential to providing assistance to poverty level citizens and providing affordable housing and neighborhood revitalization.
2. Another obstacle is the need to bring all interested parties to the table and having all parties buy into a common goal. With many programs, a plan that is best for one portion of the city may drain resources from another part of the city. Having all partners understand and buy into the common goal remains a challenge. While we have made great strides in this area, still work remains.
3. Coupled with the obstacle above is an educational process to assure that our citizens see the need to address long term goals. Energy independence 10 or more years out is a difficult concept to sell to a person who is having difficulty meeting today’s energy bills or the person who sees their life nearing an end and sees no need to change. Both these require a comprehensive approach throughout our community.
4. Another obstacle is having our citizens realize that continued education is essential to our growing community. Our employment entry level citizens must gain the needed education and training to meet the needs of industry and business and our citizens with good jobs must remain current with job skills in an ever changing job market.

## **PRIORITY HOUSING NEEDS (91.215 (b))**

- 1. Identify the priority housing needs and activities in accordance with the categories specified in the Housing Needs Table (formerly Table 2A). These categories corresponds with special tabulations of U.S. Census Data provided by HUD for the preparations of the Consolidated Plan.*
- 2. Provide an analysis of how the characteristics of the housing market and the severity of housing problems and needs of each category of residents provided the basis for determining the relative priority of each priority housing need category.*
- 3. Describe the basis for assigning the priority given to each category of priority needs.*
- 4. Identify any obstacles to meeting underserved needs.*

Table 15 (consistent with HUD Table 2A) provides estimates of the housing needs among low-income and moderate-income families in the City of North Little Rock. The information presented is based primarily on data from HUD's Comprehensive Housing Affordability Strategy (CHAS) estimates.

The table documents how many households are facing cost burdens (housing costs which exceed 30% of household income) and severe cost burdens (housing costs which exceed 50% of household income). Many of the households identified as having housing problems that do not face cost burdens are subject to overcrowding or substandard conditions. In the table, the phrase "Any Housing Problems" refers to households with a cost burden greater than 30% of income and/or living in overcrowded housing units and/or living in housing units without complete kitchen or plumbing facilities.



**TABLE 15**  
**SOCDS CHAS Data: Housing Problems Output for All Households**

North Little Rock	CHAS Data Book					Data Current as of: 2000					
	Renters					Owners					
Household by Type, Income & Housing Problem	Elderly 1 & 2 members	Small Related 2 to 4	Large Related 5 or more	All Other	Total Renters	Elderly 1 & 2	Small Related	Large Related 5 or more	Total Other	Total Owners	Total Households holds
	(A)	(B)	(C)	(D)	(E)	(F)	(G)	(H)	(I)	(J)	(K)
1. Household Income <= 50% MFI	1,100	1,815	474	1,180	4,571	1,205	488	150	293	2,136	6,707
2. Household Income <= 30% MFI	738	1,091	326	606	2,761	468	116	49	138	771	3,532
3. % with any housing problems	576.9	83.8	91.1	75.9	75.7	64.3	87.9	100.0	67.4	70.7	74.6
4. % Cost Burden > 30%	56.4	80.6	85.0	75.9	73.6	64.3	87.9	100.0	67.4	70.7	73.0
5. % Cost Burden > 50%	34.6	67.7	66.0	68.6	58.9	46.4	70.7	51.0	60.1	52.8	57.5
6. Household Income >30 to <= 50% MFI	362	726	148	574	1,810	737	372	101	155	1,365	3,175
7. % with any housing problems	53.9	61.7	77.7	69.3	63.9	25.5	63.4	71.3	60.6	43.2	55.0
8. % Cost Burden > 30%	53.9	56.3	52.0	68.6	59.4	25.5	62.4	43.6	60.6	40.9	51.4
9. % Cost Burden > 50%	17.7	18.3	0.0	21.4	17.7	9.8	25.0	29.7	41.3	19.0	18.2
10. Household Income >50 to <= 80% MFI	221	838	252	896	2,207	1,012	700	149	363	2,224	4,431
11. % with any housing problems	53.4	16.6	51.2	25.9	28.0	18.8	27.4	51.7	36.4	26.6	27.3
12. % Cost Burden > 30%	53.4	15.6	11.9	24.8	22.7	18.4	27.4	25.5	36.4	24.6	23.7
13. % Cost Burden > 50%	13.6	1.2	0.0	3.8	3.4	6.3	4.9	0.0	5.5	5.3	4.3
14. Household Income > 80% MFI	394	1,785	237	1,558	3,974	2,513	5,465	724	1,558	10,260	14,234
15. % with any housing problems	8.6	6.7	43.9	3.9	8.0	6.5	4.2	22.7	14.0	7.6	7.7
16. % Cost Burden > 30%	8.6	1.7	0.0	2.6	2.6	5.9	3.8	6.2	13.4	5.9	5.0
17. Cost Burden > 50%	1.0	0.0	0.0	0.0	0.1	0.8	0.7	1.4	1.6	0.9	0.7
18. Total Households	1,715	4,440	963	3,634	10,752	4,730	6,653	1,023	2,214	14,620	25,372
19. % with any housing problems	44.7	36.5	67.0	31.6	38.9	17.8	11.4	35.4	24.3	17.1	26.3
20. % Cost Burden > 30	44.5	32.6	39.9	30.7	34.5	17.4	11.0	17.2	23.8	15.5	23.5
21. % Cost Burden > 50	20.6	19.9	22.3	15.8	18.8	7.9	3.7	6.4	8.7	6.0	11.4

As demonstrated by Table 15, there are various degrees of housing problems by household type, income and housing problems. Specifically related to renters, this table shows that there are 4,630 renters that pay more than 50% of their family income for rent and 2,779 pay in excess of 30% of their income for rent. Of those in these income groups, a full 75% have some housing problems with 73% with rents at or above 30% of their income being paid for housing. The issues clearly have an impact across the board which includes elderly households, small related households, large households and those in the “all other” category.

As income levels increase, the percentages of housing problems decrease. Only 7.9% of renters with income at or above 80% of median income as an example experienced any housing problems with only 2.6% experiencing cost over burden in excess of 50% of their incomes.

This data along with data in other sections of this document lead us to realize that some of our housing needs are priorities. Among the priority needs, we find that our City needs to remain committed to housing development in general. Simply continuing to develop more housing and newer housing allows our community to keep up with innovations that allow our residents to occupy better and more energy efficient housing. While supporting all types of housing

development, we also see the need to focus efforts on affordable housing to be certain our residents are able to limit the amount of housing dollars required for housing thus allowing them to utilize additional funding on other quality of life endeavors.

As we look at priorities, we must focus on forms of assistance that allows the less affluent to be able to reside in decent, safe, and affordable housing. Any priority must then include the provision of housing accompanied by rental assistance. A strong housing authority must be a part of a great community.

Other forms of rental assistance must be pursued as well. Our City fully supports the use of low-income housing tax credits for the development of multifamily housing. We continue to welcome developers and developments that provide this assistance.

Our efforts include supporting new and innovative forms of public housing. Our local Housing Authority is looking at new and innovative ways in which to better serve our low- and moderate-income population. Upgrading the Housing Authority stock, making improvements to the living condition for its tenants is a hallmark of our Housing Authority. With recent stimulus money, our Housing Authority provided additional handicapped accessible parking areas, additional HVAC and other amenities to assure that local low-income housing stock remains competitive and adequate for our citizens.

Our local Housing Authority partnered with the City, Argenta Community Development Corporation and Habitat for Humanity to win NSP2 funds to develop the Baring Cross and Holt neighborhoods. This major effort addresses another of our older neighborhoods that has taken a dramatic step from homeownership to rental to crime infested over the past 30 – 40 years, a trend that is too often happens as housing stock deteriorates.

Our City also is aggressively pursuing annexation of lands and reclaiming of infill lots to provide more sites for construction of housing units. For the past ten years, we have seen our downtown area grow in housing units, new townhouses, loft apartments and rental apartments.

Annexation of lands to our east has brought a new wave of development where it was previously thought development would not occur. So, our priority housing needs include the continuation of policies and programs that actively pursue new and diverse developments in all areas of our City.

As with most cities, money is frequently an obstacle in stabilizing neighborhoods and creating new affordable housing developments. The City will continue to support the development of affordable housing and continue to partner with other organizations to apply for any funding available to assist the City in stabilizing neighborhoods and improving our housing stock.

See Appendix D for Table 2A entitled Priority Housing Needs/Invest Plan Table.

### **Priority Housing Goals**

1. Continued commitment to housing developments in general and specifically in affordable housing developments.
2. Continued commitment to retention of current housing stock with an emphasis on both code enforcement and rehabilitation.
3. Support of new and innovative housing concepts and trends.
4. Support of applications by our partners for housing grants.
5. Annexation of additional areas for housing development.

### **HOMELESS NEEDS ASSESSMENT (91.215 (c))**

1. *Using the results of the Continuum of Care planning process, identify the jurisdiction's homeless and homeless prevention priorities specified in Table 1A, the Homeless and Special Needs Population Chart. The description of the jurisdiction's choice of priority needs and allocation priorities must be based on reliable data meeting HUD standards and should reflect the required consultation with homeless assistance providers, homeless persons, and other concerned citizens regarding the needs of homeless families with children and individuals. The jurisdiction must provide an analysis of how the needs of each category of residents provided the basis for determining the relative priority of each priority homeless need category. A separate brief narrative should be directed to addressing gaps in services and housing for the sheltered and unsheltered chronic homeless.*
2. *A community should give a high priority to chronically homeless persons, where the jurisdiction identifies sheltered and unsheltered chronic homeless persons in its Homeless Needs Table – Homeless Populations and Subpopulations.*

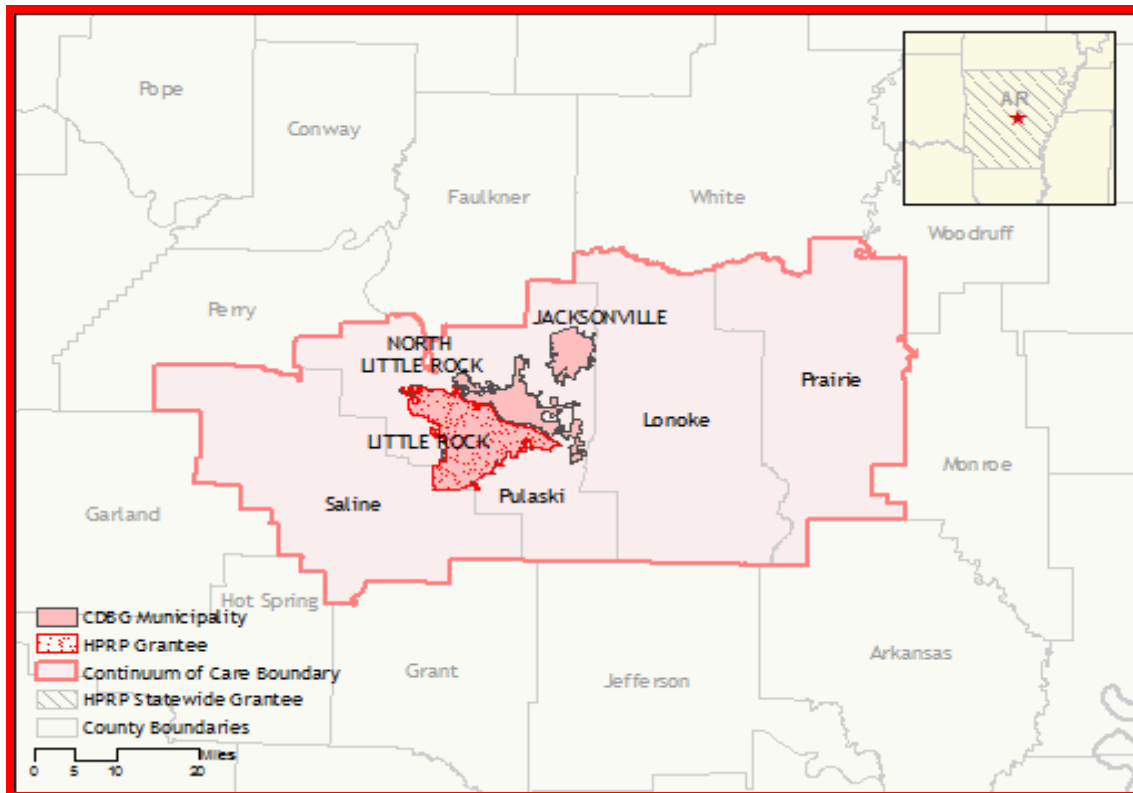
The Continuum of Care (CoC) in Central Arkansas was organized in the late 1990's and its focus in the beginning was on assisting organizations to make application to the Department of Housing and Urban Development in order to seek funding for programs that serve the homeless in the four counties and

assisting with the planning of an annual homeless conference. The CoC served Central Arkansas and created the organization known as Central Arkansas Team Care for the Homeless (CATCH). CATCH represents a four-county area – Pulaski, Lonoke, Prairie, and Saline counties. Over the years, CATCH has become more established, organized, and has broadened its mission to focus on identifying the needs of local homeless populations, the resources that are currently available in the community to address those needs, and additional resources needed to fill identified gaps. CATCH is a community-based approach that encourages the creation of collaborative, comprehensive systems to meet the diverse needs of local homeless populations. The Cities of North Little Rock, Little Rock and Jacksonville are members of CATCH. The Director of the North Little Rock Community Development Agency serves on the board of CATCH.

See map below of the CATCH Continuum of Care coverage area.

#### Map 4

##### Central Arkansas Team Care for the Homeless (CATCH) Continuum of Care Map



To determine the nature and extent of homelessness in North Little Rock, it is necessary that we examine data obtained from the Continuum of Care. The accurate counting of the number of homeless is a difficult process, but CATCH

has for the past several years conducted a point-in-time count on a particular night in January in the four counties served by CATCH. CATCH followed HUD's definition of homelessness in conducting this count and used supervised community teams composed of volunteers, including homeless people and students. HUD's definition of "chronic homelessness" is defined as a situation in which an unaccompanied person has been without a permanent residence for a period of more than one-year, or for more than 4 times in the past 3 years, and suffers from a disabling condition (usually mental health or substance abuse) that is contributing to homelessness.

In 2009, the Point-In-Time Count Committee of CATCH found a total of 1,425 men, women and children determined to be homeless on the night of January 27, 2009. Four hundred and fifty-two (452), thirty-two percent (32%), were found to be unsheltered and living on the streets; 349 (25%) were counted as sheltered living in local emergency shelters; and 624 (44%) were counted as transitionally housed while living in some type of transitional housing such as a treatment or training program. The majority of the homeless population was in Pulaski County. Following the HUD definition of homeless, the count did not include homeless individuals or families considered to be "doubled up" in private dwellings nor did the final count findings include 140 homeless individuals in local inpatient facilities. The count does not include nearly 500 formerly homeless individuals and families with special needs, as defined by HUD, now residing in permanent housing with continuous support including case management and other services.

**TABLE 16**

<b>Point-In-Time Count – January 27, 2009</b>		
Type of Homelessness	Number of Homeless	Percentage of Homeless
Unsheltered – Living on the Streets	452	32%
Sheltered	349	25%
Transitional Housing	624	44%
<b>TOTAL HOMELESS</b>	<b>1,425</b>	

As Table 16 indicates, the group of 349 persons counted as sheltered was served by a number of organizations providing shelter including, but not limited to, Compassion Center, Our House, Salvation Army, Union Rescue Mission, Lighthouse, River City Ministry and Day Resource Center, Central Arkansas Veterans Healthcare System, St. Francis House, Global Ministries, Interfaith Network and Helping Hand Clinic.

The unsheltered count of thirty-two percent (32%) did not adequately capture sub-population information. Therefore, the sub-population information pertains only to those who were sheltered in emergency shelters or transitional housing shelters. In further consideration of the count data, the Committee's analysis

found 20% of the total sheltered count was living in a family group and 10% were found to be a victim of domestic violence. Three percent (3%) of the total sheltered count was found to be unaccompanied youth. Facilities included as serving these homeless groups are: Arkansas Cares, Women and Children First, Dorcas House, Lonoke County Task Force on Child Abuse and Neglect, Our House and Interfaith Network.

Twenty-eight percent (28%) of the total sheltered count were identified as having a substance abuse problem or mental illness. From the final sheltered count numbers, 10% were identified as veterans of military service, and a total of 8% were identified as chronically homeless.

The large numbers of homeless persons, the high cost of housing and the number of people living in poverty combine to create serious problems in the service systems. This combination complicates the problem of finding suitable and affordable housing for homeless and at-risk families. Without comprehensive intervention, the majority of the homeless will remain while more families will fall into the at-risk and actual category of homelessness.

Affordable permanent housing is needed throughout the City of North Little Rock. While HOME and Low Income Tax Credit subsidies are available to produce permanent housing, the availability of these subsidies is not nearly sufficient to meet the City's needs. Mixed-income communities near available jobs demonstrate a better approach to this problem than concentrating the City's low-income population in one area.

In 2006, a Ten-Year Plan to End Chronic Homelessness in central Arkansas by 2016 was developed by a collaboration of community leaders, service providers, and resource partners to create a well-connected network of services that moves persons who are chronically homeless into supportive housing as quickly as possible. To achieve this goal, a continuum of support that included health, mental health, substance abuse, outreach, transportation, and other services had to be strengthened. At the same time, the stock of affordable housing had to be enlarged.

Some of the strategies outlined in the Ten-Year Plan have been accomplished. A Homeless Services Coordinator was hired to assist in implementing the Plan; a temporary Day Resource Center was established at River City Ministry in North Little Rock funded provided by the cities of North Little Rock and Little Rock and a permanent location is being explored; the Homeless Management Information System (HMIS) use and application were expanded; and, some increase in the stock of affordable housing available to individuals who are chronically homeless has materialized but more is needed. While there has been many positive accomplishments in eliminating chronic homelessness, there is still much to be done.

**Table 1A**  
**Homeless and Special Needs Populations**

**Continuum of Care: Housing Gap Analysis Chart**

		<b>Current Inventory</b>	<b>Under Development</b>	<b>Unmet Need/ Gap</b>
<b>Individuals</b>				
<b>Example</b>	<b>Emergency Shelter</b>	<b>100</b>	<b>40</b>	<b>26</b>
<b>Beds</b>	Emergency Shelter	319	0	45
	Transitional Housing	380	0	372
	Permanent Supportive Housing	332	0	735
	Total	1,031	0	1,152
<b>Persons in Families With Children</b>				
<b>Beds</b>	Emergency Shelter	89	0	55
	Transitional Housing	211	0	65
	Permanent Supportive Housing	298		67
	Total	598		187

**Continuum of Care: Homeless Population and Subpopulations Chart**

Part 1: Homeless Population	Sheltered		Unsheltered	Total
	Emergency	Transitional		
Number of Families with Children (Family Households):	18	46	2	66
1. Number of Persons in Families with Children	47	191	8	246
2. Number of Single Individuals and Persons in Households without children	302	433	444	1,179
(Add Lines Numbered 1 & 2 Total Persons)	349	624	452	1,425
Part 2: Homeless Subpopulations	Sheltered		Unsheltered	Total
a. Chronically Homeless	54		16	70
b. Seriously Mentally Ill	45			
c. Chronic Substance Abuse	222			
d. Veterans	83			
e. Persons with HIV/AIDS	1			
f. Victims of Domestic Violence	95			
g. Unaccompanied Youth (Under 18)	21			

**HOMELESS INVENTORY (92.210(c))**

The chart below documents the inventory of beds in the CATCH Continuum of Care compiled by the Homeless Management Information System (HMIS).

**TABLE 17**

<b>Provider Name</b>	<b>Year-Round Family Beds</b>	<b>Year-Round Single Beds</b>	<b>Total Year-Round Beds</b>
Better Community Builders, Inc.	0	67	67
Central Arkansas Veterans Healthcare System	0	191	191
Gyst House	0	75	75
Interfaith Hospitality Network	14	0	14
Little Rock Compassion Center	0	290	290
Little Rock Community Mental Health Centers, Inc.	302	215	517
Our House, Inc.	36	73	109
Recovery Centers of Arkansas	0	116	116
St. Francis House	0	60	60
The Centers for Youth and Families	0	16	16
The Gaines House, Inc.	3	1	4
The Salvation Army – Little Rock	9	82	91
Union Rescue Mission	25	167	192
United Methodist Children's Home	96	0	96
Women and Children First	84	6	90
Total Number of Emergency Shelter Year-Round Beds			757
Total Number of Transitional Housing Year-Round Beds			523
Total Number of Permanent Housing Year-Round Beds			674



**SUPPORTIVE SERVICES FOR THE HOMELESS**

The following services listed in Table 18 are available to the homeless:

**TABLE 18**

Provider Organizations	Prevention					Outreach			Supportive Services									
	Mortgage Assistance	Rental Assistance	Utilities Assistance	Counseling/Advocacy	Legal Assistance	Street Outreach	Mobile Clinic	Law Enforcement	Case Management	Life Skills	Alcohol & Drug Abuse	Mental Health	Healthcare	HIV/AIDS	Education	Employment	Child Care	Transportation
Arkansas CARES				x					x	x	x	x	x		x		x	x
Arkansas Homeless Coalition		x	x	x		x			x	x	x	x		x	x			x
Arkansas Workforce Centers				x		x	x		x	x		x			x	x		x
Baptist Health System							x				x	x	x	x	x			
Better Community Developers				x	x				x	x	x	x		x	x	x	x	x
Center for Youth and Families									x			x			x			x
Dorcas House			x	x	x				x	x	x	x	x		x	x	x	x
Gain, Inc.		x	x	x		x			x	x	x	x	x	x	x	x		x
Gaines House										x								
GYST House									x	x	x				x	x		
Hunger Free Arkansas				x		x												
Interfaith Hospitality Network				x					x	x					x		x	x
Little Rock Community Health Center		x	x	x	x	x			x	x	x	x		x		x		x
Little Rock Compassion Center				x					x	x	x					x		x
North Little Rock/ Little Rock Public School District				x											x		x	x
North Little Rock/Little Rock Police Department								x										
Open Hands Clinic				x					x				x	x	X			
Our House, Inc.									x	x		x			x	x	x	x
Recovery Centers of Arkansas				x					x	x	x	x						
River City Ministries			x	x	x	x	x		x	x		x	x		x	x		X
Salvation Army Benton				x			x				x							X
Salvation Army Little Rock				x			x				x							x
Salvation Army North Little Rock				x			x				x							x
SOAR				x					x	x	x	x	x		x	x		x
St. Francis House		x	x	x		x			x	x	x	x	x		x	x	x	X
Union Rescue Mission				x		x			x	x	x					x		X
University of Arkansas Medical Science							x				x	x	x	x	x			
VA Drop-In Center		x	x	x		x	x	x		x	x	x	x	x	x			x
Women and Children First		x	x	x	x	x		x	x	x					x	x	x	x

## HOMELESS STRATEGY – GOALS

1. Housing – Expand the inventory of housing for homeless individuals.
2. Housing – Expand the inventory of housing for homeless persons in families with children.
3. Housing – Support permanent supportive affordable housing units to special needs population.
4. Work with non-profit organizations to assist them in their fundraising efforts.
5. Expand services provided to homeless families and individuals.

## COMMUNITY DEVELOPMENT (91.215(e))

1. *Identify the jurisdiction's priority non-housing community development needs eligible for assistance by CDBG eligibility category specified in the Community Development Needs Table (formerly Table 2B), i.e., public facilities, public improvements, public services and economic development.*
2. *Describe the basis for assigning the priority given to each category of priority needs.*
3. *Identify any obstacles to meeting underserved needs.*
4. *Identify specific long-term and short-term community development objectives (including economic development activities that create jobs), developed in accordance with the statutory goals described in section 24 CFR 91.1 and the primary objective of the CDBG program to provide decent housing and a suitable living environment and expand economic opportunities, principally for low- and moderate-income persons.*

## **Non-Housing Community Development Needs**

In addition to the housing needs presented in this Plan, the City of North Little Rock has a variety of non-housing community development needs. The City has analyzed and evaluated its Non-housing Community Development needs in a variety of forums. The administration meets on a regular basis among departments to determine the City's capital and community development needs. The City's Community Development Agency staff used a variety of methods to notify the public about opportunities to contribute to, and comment on, the needs of the Consolidated Plan during the beginning of the Consolidated Plan process.

The focus on non-housing community development needs discussion that follows will be on areas of need, which some have the potential to be addressed by the Community Development Block Grant Program, but many of the community development needs will require additional funding from private and public sectors.

Argenta is identified as a portion of the downtown area of the City of North Little Rock. Over the past several years, the Argenta area has slowly stabilized and has become very a viable area by renovating existing houses, redeveloping the commercial district, promoting art venues for artists, etc., but there is still much to do to enhance the development of this area.

In many ways Argenta is one of Central Arkansas' model neighborhoods with its mix of housing and businesses, its walkable streets, and a desire to thoughtfully grow. Argenta offers both a glimpse of the region's historic urbanism and a way of community building that can address today's urban challenges. In the past couple of years, the downtown area called Argenta has been branded as "Argenta Arts District." Each year, Argenta has several art events which includes all forms of art: Performing Arts, Third Friday Art Walk, Culinary Week

In 2002 the City of North Little Rock's Planning Department prepared a Downtown Master Plan which put forth a comprehensive vision for the downtown area. In 2004 the City contracted with a consulting firm to prepare a Waterfront Development Strategy and Master Plan and this plan analyzed the Argenta riverfront and developed a conceptual framework for redevelopment.

In 2009, the City of North Little Rock collaborated with Argenta Community Development Corporation (a non-profit organization), and The Mill, LLC to assist in funding the Argenta District Master Plan. The Argenta District Master Plan is a community-based blueprint for growth in downtown North Little Rock that combines land use, transportation, infrastructure, economic development, housing, and design into a comprehensive vision for the area's future that, in many ways, draws on the best elements of the past. This unique public-private partnership laid the foundation for an implementation-focused plan that builds on the area's history. It established a model for how North Little Rock can revitalize

other aging districts in a way that is environmentally, socially, and economically sustainable.

According to the Argenta District Master Plan prepared by Tunnel-Spangler-Walsh & Associates, the City has a lot of vacant property or property used for parking not including on-site accessory parking, for businesses in the downtown area. The Argenta District Master Plan made the following recommendations.

## **Master Plan Goals**

Detailed goals were developed to guide the master plan, including:

- Preserve, extend, and enhance Argenta's historic character.
- Provide a mix of retail, office, employment, cultural, housing and open spaces.
- Promote multi-cultural and economic diversity.
- Expand housing options for people of different ages, incomes and backgrounds.
- Establish a balanced transportation system.
- Build and promote a positive identity and brand.
- Create jobs in growth industries including film and urban agriculture.

The City of North Little Rock City Council approved the 2010 Master Plan for the Argenta Downtown District in August, 2010.

The City's Riverfront Park which is located on the Arkansas River has been utilized for all kinds of public and private venues. As the development along the Arkansas River increases to include restaurants, hotels, housing developments, entertainment venues and the opening of the Clinton Bridge for pedestrian traffic, the need for a water taxi in the future to provide transportation for people to be transported from one part of the river development to another area will be evident. Not only would the water taxi provide transportation for the various developments or venues along the Arkansas River, but it will add to the character of the area, encourage tourism and provide economic development. Additionally, the City plans to extend the trolley line north on Main Street if funding becomes available.

The City of North Little Rock utilizing CDBG funds can provide assistance to areas within the boundaries of our target area. Currently, these programs include infrastructure improvements, public facilities improvements, economic development activities, assistance to nonprofits who serve low- to moderate-income persons, and improvements to park lands. The City may fund projects anywhere in the corporate limits of the City, but to meet HUD's eligibility and national objectives criteria, projects need to serve low- to moderate-income persons. When projects are funded outside of the target area, the City conducts

a survey of each household of the area of the proposed project to obtain income information to ensure that the project's main beneficiary is low- to moderate-income persons.

Based on the feedback from citizens, city staff, and for profit and nonprofit organizations, the following priority needs have been identified for implementation under CDBG funding that will benefit low- to moderate-income persons in the City of North Little Rock. They are:

- Drainage and Street Improvement
- Sidewalks
- Façade Improvements for commercial properties in the City's Target Area
- Public Service Activities through nonprofit agency(s)
- Capital Improvements to public service facilities
- Economic Development to expand employment opportunities through business development – retention, expansion and attraction
- Parks, Recreational Facilities
- Homeless Facilities
- Youth Centers

### **Obstacles to Meeting Underserved Needs**

The City of North Little Rock faces numerous obstacles to meeting underserved needs. These include but are not limited to the following:

- Limited Financial Resources – This is the predominant obstacle to meeting all underserved needs. There is not enough funding to address the entire housing and community development needs of the City.
- Success with the Provision of Social Services – The City has been successful in developing social service assistance programs. The successful provision of quality services can result in persons requiring such services migrating to the City to consume these services and programs. With the continued in-migration of new persons needing these services, it may become impossible to have resources that will meet the demand.

### **Public Facilities and Improvement Needs**

The main emphasis of the City's community development efforts is to strengthen its neighborhoods. The City currently has 30 active neighborhood associations. To improve upon and to continue this success, our City has a variety of programs and activities to provide decent and affordable housing and to empower and improve the quality of life of our residents. To remove blight, the City has

focused its efforts on the identification of problem properties that are brought to the attention of owners for rehabilitation or demolition.

In support of efforts to strengthen neighborhoods, there is a need to provide neighborhood beautification improvements such as streetscapes, sidewalk improvements, lighting and open space improvements, park and recreational facility improvements, improvements to neighborhood community centers, and improvements with storm-water runoff.

Handicapped accessibility improvements and improvements to public services facilities, especially those providing educational services, health services, and child care services are a priority. Improvements in support of economic development efforts and affordable housing development are also needed.

### **Public Service Needs**

The City has a wide range of public services available, and most agencies serve residents throughout the City. The vast majority of these needs are funded through local, state and federal resources which are separate from the CDBG program. The City has identified several areas of need, which meets its overall CDBG objectives. These include elderly support services; youth programs; job training and skill development; community empowerment and awareness programs; community-based health services; and programs and activities that address the needs of special needs individuals.

There is a need to provide after school and youth enrichment programs which provide for supervised and structured recreational and tutorial activities; educational development; cultural awareness and positive adult interaction. The North Little Rock Boys and Girls Club has three locations in North Little Rock and have an after school program entitled “A Positive Place for Kids” at each facility. Several hundred children attend this program at the three facilities. The long-term goal is to improve each student’s academic performance, improve student behavior, and provide a low student/teacher ratio to students that need extra learning experiences.

Another program at the Boys and Girls Club is Career Launch which has two components – career exploration and job readiness. They recognize that all of the children they serve will not attend college. In order to keep in line with their plan for breaking the cycles of poverty, they want to insure that their members are elevated beyond their current socio economic conditions. The Boys and Girls Club plans on creating a training center where members of the community involved in the various fields can help lay the groundwork for various trades as an option.

Elderly programs are needed to ensure that the basic day-to-day living needs of the City's senior population are met. Arkansas has the third highest rate of senior hunger in the nation. CareLink purchased a building in North Little Rock in 2009 on Pike Avenue and plans to renovate the building to house their commercial kitchen for their "Meals on Wheels" program. Additionally, CareLink plans to renovate the remaining section of the building for an Adult Day Care Center. The City's Senior Center is integral to the provision of services and programs including nutritional programs, preventive health programs and recreational and social activities. Transportation services are needed to ensure the needs of the homebound elderly are met and to reduce the isolation of seniors from their peers and the community. There is a need to continue to keep the elderly integrated into the community and active through recreational activities, physical fitness, and cultural and social events.

Job training, educational enhancement activities, and skill development in support of economic development, and the empowerment of individuals throughout the community were identified as needs on a variety of levels. Assistance with obtaining and maintaining employment was also identified.

Health care programs, especially those that emphasize preventive activities are needed to promote the concept of healthy individuals, families and communities. Immunizations; pre-natal health; infant; children and maternal health; and educational and outreach programming are all key components to community health services. Lead testing and lead-based paint poisoning prevention, drug and alcohol addition services and disease prevention programs need to be supported in a variety of ways.

Additionally, there is a need for wellness or healthy lifestyle programs that consists of a combination of activities designed to increase awareness, assess risks, educate, and promote voluntary behavior change to improve the health of an individual, encourage modifications of his or her health status, and enhance his or her personal well-being and productivity, with a goal of living healthier, living in a culture of wellness and reducing health care costs.

The City of North Little Rock received funding in 2010 from the Center for Disease Control and Prevention to fund Childhood Obesity Prevention Programs and promote healthy lifestyles in the North Little Rock School District. Childhood obesity continues to be a growing problem in today's society. In fact, almost one in three children in the United States is considered overweight or obese. Over the past 20 years, childhood obesity rates have doubled and are now at epidemic rates. This funding will spread over the next two years with activity expected to begin late fall 2010. The goal of this project is to reduce or eliminate childhood obesity. Research suggests that a healthier school environment can result in a greater academic achievement and healthier lives for students and school staff. It will take a joint effort to achieve this goal and that is why the City plans to work collaboratively with various groups like the Arkansas Obesity Coalition, Arkansas

Department of Health, Arkansas Department of Education, North Little Rock School District and others to promote and sustain policy changes that will help combat childhood obesity in the North Little Rock School District.

Community awareness programs covering issues such as substance abuse and crime prevention have been successful components of the City's community development efforts. These programs need to be continued in support of neighborhood stabilization and empowerment of residents. Programs that encourage neighborhood residents to become involved in the future of their neighborhood and the City also need to be supported. There is a need to support transportation services to employment and medical services. This is especially critical to ensure that jobs available in outlying areas are accessible to low- and moderate-income persons. In addition to transportation to jobs, access to affordable quality child-care is crucial to ensuring long-term employment stability.

Programs that work in collaboration with housing and supportive services activities, particularly those for special needs individuals such as the homeless, persons threatened with homelessness, persons with substance abuse problems, individuals with HIV/AIDS and/or persons with disabilities (physical, mental, or developmental) need to be supported. By providing services concurrently with housing assistance, success rates of individuals transitioning from supportive housing to traditional permanent housing will be increased.

### **Economic Development Needs**

As part of the strategic planning process, the City has identified its Economic Development Needs. The need to address unemployment and underemployment is crucial if the City is to have vibrant and economically thriving neighborhoods. In terms of the City's infrastructure, there is a need to effectively utilize or redevelop sites once occupied by older, obsolete industrial or commercial structures. Tied to this is the need for environmental remediation of contaminated sites or Brownfields. Site clearance, assembly and clean-up are integral to ensure developable sites for future economic development are key to attracting new businesses.

Access to technical assistance for businesses; appropriate job training and job skill development; affordable day care to support parents during job training and employment; and adequate transportation to employment are needed to support the City's economic development efforts.



**HUD Table 2B**  
**Priority Community Development Needs**

Priority Need	Priority Need Level	Dollars to Address Need	Priority Need	Priority Need Level	Dollars to Address Need
Acquisition of Real Property	M	\$1 m	Public Services (General)		
Disposition	M	\$500k	Senior Services	H	\$150k
Clearance and Demolition	M	\$1 m	Handicapped Services	H	\$10k
Clearance of Contaminated Sites	M	\$500k	Legal Services	L	
Code Enforcement	M		Youth Services	M	\$300k
Public Facility (General)			Child Care Services	L	
Senior Centers	L		Transportation Services	M	\$2m
Handicapped Centers	L		Substance Abuse Services	M	\$125k
Homeless Facilities	M	\$1k	Employment/Training Services	L	
Youth Centers	M	\$125k	Health Services	M	\$1m
Neighborhood Facilities	M	\$45k	Lead Hazard Screening	H	\$30k
Child Care Centers	L		Crime Awareness	M	\$1m
Health Facilities	M	\$1m	Fair Housing Activities	M	\$20k
Mental Health Facilities	L		Tenant Landlord Counseling	L	
Parks and/or Recreation Facilities	M	\$10m	Other Services		
Parking Facilities	M	\$2m	Economic Development (General)		
Tree Planting	M	\$2k	C/I Land Acquisition/Disposition		
Fire Stations/Equipment	M	\$10m	C/I Infrastructure Development	M	\$5m
Abused/Neglected Children Facilities	L		C/I Building Acq/Const/Rehab		
Asbestos Removal	M	\$250k	Other C/I		
Non-Residential Historic Preservation	M	\$1m	ED Assistance to For-Profit	M	\$125k
Other Public Facility Needs	M	\$2.5m	ED Technical Assistance		
Infrastructure (General)			Micro-enterprise Assistance		
Water/Sewer Improvements	M	\$10m	Other		
Street Improvements	M	\$2m			
Sidewalks	M	\$1.5m			
Solid Waste Disposal Improvements	L				
Flood Drainage Improvements	M	\$50m			
Other Infrastructure					

## **BARRIERS TO AFFORDABLE HOUSING (91.210 (e) & 91.215 (f))**

1. Explain whether the cost of housing or the incentives to develop, maintain, or improve affordable housing are affected by public policies, particularly those of the local jurisdiction. Such policies include tax policy affecting land and other property, land use controls, zoning ordinances, building codes, fees and charges, growth limits, and policies that affect the return on residential investment.
2. Describe the strategy to remove or ameliorate negative effects of public policies that serve as barriers to affordable housing, except that, if a State requires a unit of general local government to submit a regulatory barrier assessment that is substantially equivalent to the information required under this part, as determined by HUD, the unit of general local government may submit that assessment to HUD and it shall be considered to have complied with this requirement.
3. If the public housing agency is designated as “troubled” by HUD or otherwise is performing poorly, the jurisdiction shall describe the manner in which it will provide financial or other assistance in improving its operations to remove such designation.

Over the past five years, the City and its partners have worked hard to increase the market for housing in its distressed neighborhoods and address the needs of its low-income population. Although much progress has been made in the past five years, much remains to be done – both in the housing arena and in the array of other factors that affect a family’s housing decisions and abilities. In particular, the need for quality affordable housing among the City’s low- and moderate-income families remains significant.

Most of the barriers to affordable housing in the City of North Little Rock are not imposed by public policies implemented by the local jurisdiction. The main barriers to affordable housing are the aging housing stock in declining and /or unstable neighborhoods; the number of houses located in our target area which are in need of repair but are located in the flood plain and requires the homeowner to have flood insurance if CDBG or HOME funds are to be utilized; the limited available land within the city limits to build affordable housing; and, the limited number of Housing Choice Vouchers available to supplement rent payments for low-income residents. The Housing Choice Voucher subsidy is not provided or administered by the City and is driven by federal funds made available to our local Housing Authority.

The City of North Little Rock has continued to make strides to streamline the development process by encouraging preliminary reviews to expedite the permitting process and implementing a “One-Stop Shop” for the issuance of permits. The City has also taken a proactive role in boarding and securing vacant and derelict buildings in order to minimize their negative impact on the surrounding neighborhood as well as to protect them for future rehabilitation and reuse. The City has also been aggressive in condemning substandard houses and has been successful in demolishing houses that are an eyesore and potential safety hazard to the community. A thorough public review of any condemned structure is utilized. All condemnations contemplating demolition of structures are reviewed by a public hearing process at City Council meetings.

Affordable housing development can be hindered by NIMBYism (not-in-my-backyard syndrome). This opposition to affordable housing is based on a number of erroneous perceptions, including that affordable housing is always “assisted” or “subsidized” housing when affordable simply means that families are paying no more than 30% of their income for shelter. Also, most homeowners – including those whose mortgages are FHA or VA insured, believed that all HUD programs are for “subsidized” housing for the poor.

Approximately 30% of the houses in the City are over 50 years old and many of the houses have not been preserved and are substandard today. Since older structures have typically experienced some loss of functional quality and deteriorating physical condition resulting in higher maintenance costs and deficiencies in code compliance, one of the City’s ongoing challenges is to promote reinvestment and property maintenance, particularly among absentee owners. Some neighborhoods have been caught in a cycle of disinvestment, with deferred maintenance on some properties leading to drops in property values, which in turn leads to more disinvestment and in the worst case abandonment. Other neighborhoods have been “rediscovered” with new construction and rehabilitation activity.

The City of North Little Rock has an active strategy to promote homeownership and the preservation and management of existing residential property. To offset the increasing cost of housing in the private market, the City has undertaken a number of strategies to preserve and develop new affordable housing.

These strategies include:

- Allocation of 50% of the City’s HOME funds to the City’s CHDOs to build affordable housing.
- Allocation of CDBG funds to Habitat for Humanity for their development of self-help and assisted new homes for low-income families.

- Allocation of HOME funds for down-payment assistance to first time homebuyers.
- Support of for-profit and nonprofit developers in the construction of Tax Credit assisted rental housing for families and seniors.
- Allocation of CDBG and HOME funds for the preservation of existing affordable owner-occupied housing.
- Applying for other federal funds allocated to promote affordable housing by demolishing substandard houses, building new affordable homes or rehabilitating existing homes to make them safe, decent and affordable.

### **LEAD-BASED PAINT (91.215 (g))**

- 1. Estimate the number of housing units that contain lead-based paint hazards, as defined in section 1004 of the Residential Lead-Based Paint Hazard Reduction Act of 1992, and are occupied by extremely low-income, low-income, and moderate-income families.*
- 2. Outline actions proposed or being taken to evaluate and reduce lead-based paint hazards and describe how lead-based paint hazards and describe how lead-based hazards will be integrated into housing policies and programs, and how the plan for the reduction of lead-based hazards is related to the extent of lead poisoning and hazards.*

The Federal Government banned the use of lead-based paint in housing in 1978. Therefore, units constructed before 1978, and possibly even in the year immediately following 1978 are at risk for lead-based paint (LBP) hazards.

Lead poisoning is a leading environmental hazard facing American children. In 1978, LBP was banned from residential use. More than 24 million homes in the United States contain lead hazards. The presence of LBP in itself is not a hazard. LBP becomes a hazard only when it becomes exposed to the environment as in buildings where paint is allowed to peel.

There are two ways to detect LBP: X-ray Fluorescence (XRF) using a hand held analyzer and lab testing for verification. Following are the six lead-based

hazards known to produce lead exposures that are known to have poisoned children: (1) Deteriorated lead-based paint on any exterior or interior surface. (2) Lead-based paint on any friction surface, particularly floors and windows painted with lead-based paint. (3) Lead-based paint on any impact surface, such as door frames. (4) Lead contaminated dust-interior household surface dust that contains lead in excess of a federal standard, as established by the Environmental Protection Agency (EPA) in April 1994. (5) Lead contaminated soil. It is believed that lead in household dust is the most common contributor to childhood lead poisoning. (6) Lead-based paint on any accessible surface that a young child could chew, such as a window sill.

For several years, the North Little Rock Community Development Agency has been actively involved in rehabilitation efforts involving housing within the defined “Target Area” of North Little Rock. We have tested for lead-based paint on those homes constructed before 1978 or around 1978. When lead-based paint is discovered through testing, lead safe work practices and interim controls are practiced. All our projects are below the \$25,000 threshold requiring abatement.

According to the 2008 American Community Survey, approximately 22,203 housing units in North Little Rock were built before 1980, placing them at risk for lead-based paint. These at-risk units constitute approximately 78% of the City’s total housing stock. From the American Community Survey, it is also possible to estimate the number of occupied housing units at risk of lead-based paint hazards. Approximately, 19,859 housing units in the City of North Little Rock are both occupied and built before 1980. A greatest percentage of the homes built prior to 1978 are located in our CDBG/HOME target area which includes the area bound by Interstate 40 on the North, Fort Roots on the West, the Arkansas River on the South, and the City limits on the East. See Table 19..

The majority of the houses located in Census Tracts with higher percentages of low- to moderate-income households contain the larger percentage of homes built prior to 1978. See Tables 3 and 4.

**TABLE 19**

<b>Total housing units</b>	<b>28,473</b>	<b>28,473</b>
Built 2005 or later	499	1.8%
Built 2000 to 2004	771	2.7%
Built 1990 to 1999	1,809	6.4%
Built 1980 to 1989	3,191	11.2%
Built 1970 to 1979	6,417	22.5%
Built 1960 to 1969	7,202	25.3%
Built 1950 to 1959	4,637	16.3%
Built 1940 to 1949	2,523	8.9%
Built 1939 or earlier	1,424	5.0%

Source: U.S. Census Bureau, 2008 American Community Survey

At this time the state of Arkansas does not have a Lead-Based Paint Hazard testing program for elementary and younger children. About five years ago, Pulaski County, North Little Rock and Little Rock partnered to apply for Federal funds to initiate a Lead-Based Paint Hazard Program in the state to be administered in the different elementary schools. The application was not funded and the state has not stepped up to provide a testing program for Lead-Based Paint Hazard Program in the schools.

### **ANTI-POVERTY STRATEGY (91.215(h))**

- 1. Describe the jurisdiction's goal, programs, and policies for reducing the number of poverty level families (as defined by the Office of Management and Budget and revised annually). In consultation with other appropriate public and private agencies, (i.e. TANF agency) state how the jurisdiction's goals, programs, and policies for producing and preserving affordable housing set forth in the housing component of the consolidated plan will be coordinated with other programs and services for which the jurisdiction is responsible.*
- 2. Identify the extent to which this strategy will reduce (or assist in reducing) the number of poverty level families, taking into consideration factors over which the jurisdiction has control.*

The City of North Little Rock has a number of families and individuals who live in poverty. While many factors related to poverty are beyond the control of the City government, the City is committed to addressing poverty issues and improving the welfare and economic status of its residents wherever possible. Most of the services described in the Five Year Strategy are services devoted primarily to helping those in poverty. Some, like homeless services, are basic elements of the "safety net" geared to those in most need. Others, like promotion of home ownership, job creation education, are more fundamental to the long term reduction of poverty in society. Throughout the strategy are recommendations and objectives that are central to the reduction of poverty. The City can most effectively fight poverty over the long term by:

- Promoting Economic Development, especially job intensive industries;
- Building the tax base so that basic city services and "safety net" services can be provided to all;

- Helping less affluent citizens purchase a home in a neighborhood where housing values are likely to increase;
- Ensuring that problem properties are reduced thereby preserving the value of neighborhood property;
- Homebuyer counseling and downpayment assistance for low- and moderate-income first-time homebuyers; and,
- Thriving for better day care, pre-school, after-school and public education systems.

In Program Years 2011 – 2015 the City will undertake a number of initiatives that are consistent with the long-term approach to reducing poverty levels described above. The City will continue to allocate funding to public service activities through the CDBG program. These activities include youth, elderly, homeless, health care, and education services, all of which benefit low- and moderate-income persons and serve to improve the economic status of lower income City residents. Other CDBG and HOME funded activities will assist low- to moderate-income persons through such activities as home repair, homeownership, public facilities, and infrastructure. All of these activities benefit lower income persons and serve to improve their economic status and well being.

A number of residents will experience improved economic conditions over the next five years, but the number of households that will move out of poverty is expected to be relatively small.

The anti-poverty strategy must include programs to increase family incomes by increasing access to jobs and improving individuals' knowledge, skills, and abilities to gain a living wage employment. The City continues to support Pulaski Technical College and other local educational venues which provide educational opportunities to students. Pulaski Tech is a comprehensive community/technical college that offers more than 80 associate degrees and certificate programs designed for students who plan to enter the workforce or transfer to four-year colleges and universities to complete bachelor's degrees.

With courses and programs offered at seven locations throughout central Arkansas and online, Pulaski Tech offers a personalized, quality education featuring small classes, cutting edge technology and dedicated faculty and staff.

The Pulaski Tech Business and Industry Center located in Little Rock provides continuing education and customized training services for businesses, industries and individuals in central Arkansas.

## **INSTITUTIONAL STRUCTURE (91.215 (I))**

- 1. Explain the institutional structure through which the jurisdiction will carry out its consolidated plan, including private industry, non-profit organizations, and public institutions.*
- 2. Assess the strengths and gaps in the delivery system.*
- 3. Assess the strengths and gaps in the delivery system for public housing, including a description of the organizational relationship between the jurisdiction and the public housing agency, including the appointing authority for the commissioners or board of housing agency, relationship regarding hiring, contracting and procurement; provision of services funded by the jurisdiction; review by the jurisdiction of proposed capital improvements as well as proposed development, demolition or disposition of public housing developments.*

The City of North Little Rock is the clearinghouse and facilitator for the activities as described by the Consolidated Plan. The Community Development Agency (CDA) is the lead administrative agency for the Consolidated Plan programs and is responsible for the administration of federal funds for housing, community and economic development programs that strengthen the City of North Little Rock and its neighborhoods. The Community Development Agency is a city department whose Director is appointed by the Mayor and supervised directly by the Mayor. All programs, projects and major contracts of the CDA are brought before the City Council for approval. The CDA provides fiscal and regulatory oversight of all CDBG and HOME as well as other federal and state grants for housing, economic, and community development.

The City Council is an elected body composed of eight aldermen or alderwomen with the Mayor presiding over the Council meetings. Our current Mayor is the longest serving Mayor in our City's history. He is serving in his fifth four-year term. The leadership understands both the challenges in front of us and the resources available to address the job.

The City of North Little Rock department directors, key staff and other major organization directors meet twice a month to share information involved with the development of current projects and service delivery within the City of North Little Rock.

The City of North Little Rock prides itself on a long track record of successful partnerships among public and private sector entities. The delivery system for



the Consolidated Plan programs is no exception. Communication and cooperation between the City of North Little Rock Community Development Agency and the partner agencies and organizations that administer activities are strong.

In the past years, CDA staff has worked closely with the other organizations involved in the Consolidated Plan programs to improve regulatory compliance, monitoring, cooperation and partnerships among agencies, and technical capacity of organizations involved in project delivery.

The single most significant impediment in the delivery system remains the lack of available funding to support community development, economic development and affordable housing projects. State funding has been drastically reduced during several years of fiscal challenges for the State of Arkansas. Private sources have been reduced as foundations, endowments and corporate profits have shrunk in recent years. Additionally, City funds are extremely limited as the City government attempts to compensate for significant reductions in local aid from state government, reduced sales tax revenue and from the impact of a national economy in flux. Finally, as the City's entitlement grants continue to shrink almost every year, despite increases in the cost of service delivery, it becomes more and more difficult to maintain existing levels of activity, nearly impossible to expand services and challenging to address major new initiatives.

The City is attempting to address these gaps in the coming years by strongly encouraging more partnerships among public service providers and by providing support to help these groups become more established and successful.

The Community Development Agency oversees the administration of all CDBG and HOME entitlement programs. The Community Development Agency is responsible for:

- Program management and oversight.
- Interdepartmental coordination.
- Subrecipient contract administration and monitoring.
- Program evaluation.
- Consolidated Plan preparation, monitoring and evaluation.
- Periodic reporting to HUD.

Other city departments and private agencies that participate in the implementation of federal-funded grants include:

- City Council – formal approval body for policy making and release of funds.
- Finance management will be appropriately separated between the Finance Department and Community Development Agency.
-

- Public Works Department works closely with our Community Development Agency in conjunction with our public works projects.
- Neighborhood Services Department provides information to our residents on meetings, grants, etc.
- The City is also served by a number of private nonprofit housing, health and human services providers, and local faith-based organizations like Habitat for Humanity, Argenta Community Development Corporation, River City Ministry, Recovery Centers of Arkansas and CareLink.

To minimize the overlapping of assignments and facilitating a more efficient use of resources, the City requires the submittal of an application each year from organizations interested in applying for CDBG funds. The application is quite lengthy but allows the applying organization to provide important information about their organization, explain why they are requesting the funds and what other funds will be used to carry out the program, activity or project. Go to Appendix C to see a copy of the application.

The North Little Rock Housing Authority is a public body chartered by the State of Arkansas consisting of a five-member Board of Commissioners. The North Little Rock Housing Authority was established in 1939 and is the oldest Housing Authority in the state of Arkansas. Although the Housing Authority is independent of the City of North Little Rock, the City does maintain a degree of control in the form of appointments to the Housing Authority's Board of Commissioners. The Housing Authority Board of Commissioners hires the Executive Director. The City and the Housing Authority share common interest in providing safe, decent housing for low- to moderate-income persons. The City works with the Housing Authority to ensure that all the Housing Authority facilities meet the codes adopted by the city.

The City and the Housing Authority have partnered to undertake projects. The North Little Rock Housing Authority is one of the City's consortium members awarded NSP2 funding. The other two members of the consortium are Habitat for Humanity and Argenta Community Development Corporation.

Residents of public and assisted housing are entitled to the same use and benefit of services provided by the City of North Little Rock as are all City residents. The Housing Authority's Five Year Plan is also coordinated and consistent with the City's Five Year Consolidated Plan.

The City of North Little Rock and the City of Little Rock partnered to fund a Resource Center for the homeless in North Little Rock at River City Ministry ( a faith-based organization). River City Ministry provides resources/services for people who are homeless. The City of North Little Rock has also allocated funds over the past ten years to River City Ministry to purchase medical equipment, medicine, dental equipment as well as provided funds to make capital

improvements to their facility so they can better serve the homeless and low-income persons.

The Director of the Community Development Agency is a member of the Central Arkansas Team Care for the Homeless (CATCH) Continuum of Care organization and serves on their board. The City has been actively involved with CATCH over the past several years and has worked with many organizations who serve the homeless.

The City of North Little Rock, the Mill, LLC and Argenta Community Development Corporation partnered to develop the Argenta District Master Plan. The goal of the Master Plan was to guide the development of an arts infused, healthy, walkable, livable community. The Plan's market studies indicate the District can absorb 802 single family homes, 1,219 multifamily homes, 180,000 square feet of office space, 220,000 square feet of retail space, and two hotels all by 2019. This development potential can best be realized through investment in place-making, art, culture, infrastructure, and amenities that attract new residents, businesses, and cultural entities. Recent success in creating and branding the Argenta Arts District has ignited the imagination and excitement of the central Arkansas arts community to embrace the District's Plan.

## **Strengths and Gaps**

In addition to the City and housing officials, our "City Family" includes a host of local entities that are involved in our delivery system. Our Chamber of Commerce has an economic development component partially funded by the City that recruits and assists in the retention of businesses to assure our citizens have ample employment opportunities. Local Community Development organizations are fostered by the City and our Department of Neighborhood

Services strengthen their ability to connect to the leadership of our City. Another strength of our system is the public information system of both the City and Housing Authority. As the departments and partners of the City meet regarding other items of City business, they also share information regarding housing. Each department functionally becomes a working partner of other departments and the city partners are closely aligned with all other partners and departments. This sense of partnership allows all entities to work together to review issues and solve problems.

The downturn in the economy and the introduction of a new administration in Washington brought about different ways of attacking problems. As with our other programs, the City aggressively approached this issue. When Federal Stimulus funding was made available, the City immediately began partnering with non-profit organizations to apply for these funds.

In conclusion, we see our network of services, our expertise and our continuity of leadership as strengths for delivery of services. We see the limited amount of funds available to be our largest weakness. Other weaknesses of note continue to include lack of education and job skills to develop paths for meaningful work and compensation.

## **Education**

In our City, 1,266 persons have less than a 9<sup>th</sup> grade education; 13,504 persons have a high school diploma, and 9,338 of our residents have a bachelor's degree or professional degree. In today's competitive economy, education past high school is imperative. Realizing that a predominance of our citizens do not have a college degree forces our City to look toward education as a focus of our efforts.

North Little Rock has a two-year college, Pulaski Technical College, which the City supports in various ways. Until recently, the City also partnered with Shorter College. While Shorter College continues to try to be a viable institution of higher learning, Pulaski Technical College is a leader in its field. Pulaski Technical College is the fastest growing two year institution in the State. While the college was founded in 1945, it made major strides beginning in 1991 and today its enrollment is 11,167 students with 80 associate degrees and a faculty of 633. This outstanding institution provides local education and training opportunities. In addition, the University of Arkansas at Little Rock and Philander Smith College located in our sister city provide educational opportunities as well.

The City remains committed to all types of learning opportunities. Our Laman Library is a state of the art public library with outstanding reading programs and opportunities for research. The Library has expanded to a branch to the downtown area. Additionally, the Library is proposing to purchase the old post office located downtown and renovate it to house the branch library, artist studios and galleries and other venues. Additionally, our senior center programs offer numerous classes and learning opportunities. It remains the City's belief that education of our residents is one of the best ways to elevate our work force to be better equipped and thereby earn a better wage.

## **MONITORING (91.230)**

- 1. Describe the standards and procedures the jurisdiction will use to monitor its housing and community development projects and ensure long-term compliance with program requirements and comprehensive planning requirements.*

## **Programmatic Monitoring**

The City of North Little Rock's Community Development Agency oversees all grant-funded housing and community development programs and will be responsible for all performance measurement activities. CDA is also responsible for the timely implementation of activities and projects. The City will ensure that all grant funded projects are monitored for compliance with the applicable city, state and federal laws.

Annually, with the preparation of Consolidated Annual Performance and Evaluation Report (CAPER), CDA will review whether specific objectives outlined in this strategic plan are being met. Furthermore, subsequent CAPERS will give an opportunity to address community priorities and if adequate resources are available to meet the objectives.

Prior to receiving CDBG/HOME funding, each prospective subrecipient is required to submit to CDA, which is included in the project application form, their program goals. This includes specific and quantitative program objectives and performance measurements, their budget, and which national objective their project will meet. They are also required to submit a program budget detailing the exact use of the requested funding amount, i.e., personnel costs, other administration costs, per unit costs, etc.

Prior to contract approval, the program goals and objectives are reviewed by CDA staff for determination of eligibility, attainability and compliance with City and CDBG objectives and requirements.

The more formal monitoring begins with a risk assessment of all grant funded projects and subrecipient agreements. The risk assessment considers size of the grant contract, changes in organizational structure, and length of time since their last on-site monitoring. During the year, CDA staff will conduct monitoring visits to selected organizations to evaluate their performance in regards to their subrecipient agreement and compliance with HUD regulations.

## **Fiscal Monitoring**

The City of North Little Rock retains all funds and reimburses the subrecipient for services provided within the subrecipient agreement. If the project or activity is a capital improvement project, the city designs the project, obtains bids or quotes for the work to be completed, oversees the construction of the project and pays the contractor directly. The nonprofit organization approves the job description, the winning bidder, the work and final inspection.

If a nonprofit organization is acquiring sports equipment, kitchen equipment, etc., the City assists the organization in obtaining qualified bids or quotes on these

items and then either pays the vendor directly for the items or reimburses the organization for the items purchased.

Since the money is retained by the City until actual work is completed or items purchased, the City is in control of the funds at all times.

The Community Development Agency also administers the Integrated Disbursement and Information System (IDIS).

### **HOME Compliance Monitoring**

HOME monitoring is performed by the Community Development Agency staff. HOME monitoring is concerned with the specifications established by the U.S. Department of Housing and Urban Development for housing production funds administered under the HOME Investment Partnership Program. These specifications apply for the "Affordability Period" determined by the amount of HOME funds invested per unit.

Projects monitored for compliance with HOME regulations are regularly reviewed by CDA staff in order to ensure that various aspects of HOME monitoring, including inspections and legal procedures, are covered.

# First Program Year Action Plan

## GENERAL

### EXECUTIVE SUMMARY

The City of North Little Rock aims to address both the housing and non-housing issues of the City. Housing goals include supporting programs that ensure adequate, safe, and affordable housing opportunities for lower-income persons, encourage the practice of Fair Housing and eliminate barriers to housing choice and opportunity, and assist low-income residents in avoiding homelessness. Non-housing goals include supporting programs that encourage the delivery of health and human services and economic opportunities that encourage self-sufficiency, reduce poverty, and assist lower-income persons in reaching their full potential.

These goals will be attained through the implementation of proposed objectives and strategies of projects and activities by the provision of funding and/or technical assistance accomplished with partnership with other organizations, developers, and agencies. The strategies, such as down payment assistance and new home construction, include the continuation of existing local programs as well as the development and implementation of new programs in response to changing needs of the City.

In the City of North Little Rock, the biggest obstacle to homeownership and the use of HOME funds is the low median income in our City. Generally, if the family can qualify for HOME funds, they don't earn enough to afford the mortgage note especially if they also have a car note or other debt. The City will continue to provide downpayment assistance to eligible first time homebuyers.

In regards to owner-occupied home repairs, the majority of our housing stock in our target area was built prior to 1978 and often not built to code. The cost associated with bringing the home up to code and mitigating lead hazards usually make it difficult to stay within the funding limits for our HOME program. In some cases the houses are in such need of repair that the City cannot bring the houses up to code with the funds available so the homeowners continue to live in substandard homes.

CHDO new construction has been a very successful program in our City. The City allocates 50% of its HOME funds to its CHDOs. Not only does the new construction help to stabilize neighborhoods but also increases our affordable housing stock. Many of the homebuyers receive a soft second lien to aid with the down payment and closing cost on the CHDO houses making the homes even more affordable. HOME funds will be used for new construction, rehabilitation and/or subsidies.

Please see the Executive Summary in the Five Year Strategic Plan for additional information.

## **GENERAL QUESTIONS**

### **Geographic Distribution of Assistance**

For the 2011 period, the City will continue to focus its primary efforts in its HOME/CDBG target area neighborhoods, which are both low- and moderate-income areas and areas of minority concentration.

In addition, the City will also assist non-profit organizations during the first year of the plan that are community-wide based and serve low- to moderate-income persons.

### **Basis for Allocating Investments**

The allocation of investments during the 2011 period conforms to the process outlined in the Five Year Consolidated Plan.

### **Addressing Obstacles to Meeting Underserved Needs During the Coming Year**

In the Five Year Consolidated Plan, the City noted three types of obstacles to meeting underserved needs: (1) awareness of needs; (2) financial resources; and (3) capacity. In the FY 2011 funding year, the City will undertake a number of actions to address these obstacles.

The City will continue to encourage and seek input from the community on conditions and needs through public hearings, neighborhood association meetings, city council meetings, and other meetings with nonprofit organizations who serve low- to moderate-income persons through their programs. City staff will also continue to make numerous contacts within the community that are conduits for learning about the needs of our residents. City staff attends neighborhood meetings and are often asked to speak at these meetings.

During the coming year, the City will continue to provide CDGE and HOME funds to assist a range of needs in the community from down payment assistance to first time homebuyers to providing funds for after school programs. Programs funded will be encouraged to extend their outreach to special needs and underserved groups.



In the fall of 2011, the next budget process will seek applications from community organizations. As part of selecting projects for assistance, the City will continue to favor those that offer innovative ways to meet community needs, including those of underserved populations.

## **MANAGING THE PROCESS**

### **Lead Agency**

The Community Development Agency (CDA) is designated by the North Little Rock City Council as the single point of contact with HUD and lead agency for the administration of the CDBG and HOME grant programs.

As the single point of contact for HUD, CDA is responsible for developing the Five-Year Consolidated Plan, Annual Action Plan and the end-of-year Consolidated Annual Performance and Evaluation Report.

### **Significant Aspects of the Plan Development Process**

For a full discussion of this subject, please see *Consultation Process* section of the Five Year Consolidated Plan.

### **Actions to Enhance Coordination in the Coming Year**

As a local government, the City of North Little Rock is a key partner and participant in many two-party and multi-party relationships that relate to the coordination and implementation of activities and services within its borders, as well as being a partner and participant in relationships of regional and wider scope.

The City recognizes the importance of coordination and, as part of its guidelines to apply for CDBG and HOME funds, applicants are asked to provide information on other funding sources and partnerships.

City staff will continue to support neighborhood organizations as a means of communication and coordination among residents, nonprofits, the business community, churches and other area stakeholders.

In the coming year the City will continue efforts to enhance coordination as part of the sustainability and suitability guidelines in its housing rehabilitation programs and projects. These guidelines seek to consider health, mobility, social and other factors of affecting the occupants, in addition to the physical aspects of housing assistance, with the intent of coordinating the assistance of various organizations.

## **CITIZEN PARTICIPATION**

The City of North Little Rock provides its citizens many opportunities to provide input to the decision making process. Citizens are encouraged to attend and participate in City Council meetings, neighborhood meetings, charrettes held by the City, and CDBG and HOME public hearing meetings to solicit public input. These community engagement practices are designed to meet the needs and requirements of various programs and planning processes.

In accordance with 24 CFR 91.115 (e), the Community Development staff developed a Citizen Participation Plan (CPP) designed specifically for the Consolidated Plan. The CPP describes city policies relating to public hearings, public notices, and comment period. A copy of the amended Citizen Participation Plan is in Appendix A.

## **INSTITUTIONAL STRUCTURE**

As discussed in the *Institutional Structure* section of the Five Year Consolidated Plan, overall, the institutional structure needed to have a functioning Consolidated Plan delivery system is in place and is reasonably complete.

The single most significant impediment in the delivery system remains the lack of available funding to support community development, economic development and affordable housing projects. State funding has been drastically reduced during several years of fiscal challenges for the State of Arkansas. Private sources have been reduced as foundations, endowments and corporate profits have shrunk in recent years. Additionally, City funds are extremely limited as the City government attempts to compensate for significant reductions in local aid from state government, reduced sales tax revenue and from the impact of a national economy in flux. Finally, as the City's entitlement grants continue to shrink almost every year, despite increases in the cost of service delivery, it becomes more and more difficult to maintain existing levels of activity, nearly impossible to expand services and challenging to address major new initiatives.

The City is attempting to address these gaps in the coming years by strongly encouraging more partnerships among public service providers and by providing support to help these groups become more established and successful.

For additional information on institutional structure, please see the *Institutional Structure* section in our Five Year Consolidated Plan.

## **MONITORING**

The City will monitor its CDBG and HOME activities to ensure compliance with program and other requirements.

Monitoring will occur in two modes: desk monitoring and formal (including on-site) reviews. Desk monitoring occurs on an ongoing basis through the submission of reports, payment requests and the review of other information that is obtained about the program or project. As the name implies, this form of monitoring is done in the office as a routine function, though it may be highly interactive through telephone, e-mail and other contacts.

Formal monitoring begins with identification of the programs and projects that are due for site visits to review records and, as applicable, work or delivery sites. The decision on the selection of monitoring visits to be made take into account the complexity of the activities and other factors that indicate the level of risk.

## **LEAD-BASED PAINT**

For several years, the North Little Rock Community Development Agency has been actively involved in rehabilitation efforts involving housing within the defined “Target Area” of North Little Rock. We have tested for lead-based paint on those homes constructed before 1978 or around 1978. When lead-based paint is discovered through testing, lead safe work practices and interim controls are practiced. All our projects are below the \$25,000 threshold not requiring abatement.

During the coming year, the City’s efforts to evaluate and reduce lead-based paint hazards will continue to take two main directions. First, all housing programs and projects assisted with CDBG and HOME funds are required under HUD and other federal regulations to address these hazards. It is a standard practice that any such use of funds entails the notification of buyers, owners and occupants. Depending on the nature and the amount of assistance being provided, the type of evaluation and approach to treatment may vary.

## **HOUSING**

### **SPECIFIC HOUSING OBJECTIVES**

#### **Housing Priorities and Objectives**

The City’s 2011-2015 priorities and objectives cover five categories that include Economic Development, Housing, Homeless Services, Human Services, and

Neighborhood Revitalization. These are presented in their entirety in the Five Year Consolidated Plan.

The Housing priorities for the first year of the Plan are:

- Preserve neighborhoods through housing rehabilitation assistance to qualified homeowners. The City anticipates approximately 6 homeowners will be assisted during FY 2011;
- Preserve habitability of owner-occupied housing through emergency home repair assistance. The City anticipates approximately 45 – 60 homeowners will be assisted during FY 2011;
- Increase homeownership through down payment assistance;
- Preserve affordability of quality rental housing through the Housing Choice Voucher program;
- Provide more opportunities to build and purchase affordable housing;
- Retaining the affordable housing stock;
- Support new and innovative housing concepts and trends;
- Support applications by our partners for other housing funding; and,
- Support annexation of additional areas for housing development.

### **Use of Available Resources During FY 2011**

Of the anticipated \$1,152,245 in CDBG and HOME funds, the City estimates \$540,016 (47%) will be devoted to housing activities for the first year of the Plan. Planned CDBG and HOME Housing funds will be distributed among the various activities as follows:

- |   |                   |
|---|-------------------|
| • Habitat for Humanity – First-time homebuyer subsidies     | \$ 20,000         |
| • Housing Rehabilitation – Emergency Repairs                | \$ 120,000        |
| • HOME Funds – Rehabilitation, New Construction & Subsidies | <u>\$ 400,016</u> |
| Total FY 1011 Housing Funds                                 | \$ 540,016        |

## **NEEDS OF PUBLIC HOUSING**

### **Public Housing Needs and Resident Initiatives**

The North Little Rock Housing Authority's mission is to promote adequate and affordable housing, economic opportunity and a sustainable living environment free from discrimination. To demonstrate the seriousness of listening to the consumers of public housing, the Housing Authority voluntarily implemented a quarterly customer survey. In addition, the Housing Authority has appointed a resident to be a voting member of its Board of Commissioners. This was in accordance with HUD policy and has been in place for more than 10 years. This allows the Housing Authority tenants to have a direct voice on the Board for any policies developed. The survey provides uncensored feedback from tenant and enables the Housing Authority to address the specific needs and concerns of the tenants. With that tool and the results of reviews and feedback from HUD, the Housing Authority has persisted in improving administrative protocols, internal control systems, and operations management. The area most often impacting tenant's perception of a decent living environment is safety. Therefore, the Housing Authority continuously addresses the need to improve safety and security measures. Preventive actions taken include the installation of surveillance equipment and contracting with security companies for outside services. North Little Rock Housing Authority continues to partner with the North Little Rock Police Department wherein three officers are assigned to work specifically with Housing Authority sites.

To increase the availability of decent, safe, and affordable housing, the Housing Authority applied for and was approved for an additional 150 VASH vouchers since their last Plan. On average, the Housing Authority's occupancy rate ranges between 96 to 98 percent in both the Public Housing and Housing Choice Voucher Program (HCVP). The Housing Authority will continue to increase the availability of housing through acquiring and building units; renovating and modernizing current units; applying for vouchers when the opportunity arises; and, promoting self-sufficiency of assisted households to move them to homeownership or fair market housing.

One way of increasing assisted housing choices is that 100 percent of voucher holders are advised of mobility during briefing and transfer procedures. The Housing Authority's Homeownership Program is a flagship program that offers the choice of eventually owning a home. As of this date, 51 families have been assisted with purchasing a home. The Housing Authority maintained the payment standard at 90 percent – 100 percent of the FMR.

The North Little Rock has 1043 Low Income Housing Units and 1192 Housing Choice Vouchers under their management. In addition, they manage 150 VASH vouchers for homeless Veterans.

Our local Housing Authority is looking at new and innovative ways in which to better serve our low- and moderate-income population. Upgrading the Housing Authority stock, making improvements to the living condition for its tenants is a hallmark of our Housing Authority. With recent stimulus money, our Housing Authority provided additional handicapped accessible parking areas, additional HVAC and other amenities to assure that local low-income housing stock remains competitive and adequate for our citizens.

Our local Housing Authority partnered with the City, Argenta Community Development Corporation and Habitat for Humanity to win NSP2 funds to develop the Baring Cross and Holt neighborhoods. This major effort addresses another of our older neighborhoods that has taken a dramatic step from homeownership to rental to crime infested over the past 30 – 40 years, a trend that is too often happens as housing stock deteriorates.

### **Assistance to Troubled Public Housing Agencies**

Not applicable. HUD has designated the North Little Housing Authority as a High Performer.

### **BARRIERS TO AFFORDABLE HOUSING**

The Fair Housing Act of 1968, as amended in 1974 and 1988, prohibits housing discrimination on the basis of race, color, sex, religion, national origin, handicap, and familial status. The U.S. Department of Housing and Urban Development has played an instrumental role in ensuring compliance with the Act, in addition to encouraging local jurisdictions to adopt local strategies and action plans to alleviate identified barriers to the accessibility of housing choice. Jurisdictions receiving federal funding are required to complete an “Analysis of Impediments” to identify impediments or barriers to fair housing choice. Impediments are defined as “any actions, omissions, or decisions, taken or which have the effect of restricting housing choices or the availability of housing choices because of race, color, religion, sex, disability, familial status, or national origin.” An Analysis of Impediments (AI) is a comprehensive review of a jurisdiction’s laws, regulations, administrative policies, procedures, and practices. It requires an assessment of how those laws, etc. affect the location, availability, and accessibility of housing; and an assessment of public and private conditions affecting fair housing choice. Jurisdictions are recommended to conduct or update their AI’s at least once every 3 to five years (consistent with the Consolidated Plan cycle) and also to review and revise as needed annually with their One-Year Annual Plans.

The City of North Little Rock just completed their Analysis of Impediments to housing choice during the development of their 2011-2015 Five Year

Consolidated Plan, and developed goals and strategies to further the practice of Fair Housing and to encourage the availability of housing choice.

Most of the barriers to affordable housing in the City of North Little Rock are not imposed by public policies implemented by the local jurisdiction. The main barriers to affordable housing are the aging housing stock in declining and /or unstable neighborhoods; the number of houses located in our target area which are in need of repair but are located in the flood plain and requires the homeowner to have flood insurance if CDBG or HOME funds are to be utilized; the limited available land within the city limits to build affordable housing; the lack of knowledge about the home buying process and finances; and, the limited number of Housing Choice Vouchers available to supplement rent payments for low-income residents. The Housing Choice Voucher subsidy is not provided or administered by the City and is driven by federal funds made available to our local Housing Authority.

During the coming year, the City will continue efforts to remove barriers to affordable housing facing households that wish to own or rent. The actions that will be taken in FY 2011 are:

- Allocation of 50% of the City's HOME funds to the City's CHDOs to build affordable housing.
- Allocation of CDBG funds to Habitat for Humanity for their development of self-help and assisted new homes for low-income families.
- Support of for-profit and nonprofit developers in the construction of Tax Credit assisted rental housing for families and seniors.
- Allocation of CDBG and HOME funds for the preservation of existing affordable owner-occupied housing.
- Applying for other federal funds allocated to promote affordable housing by demolishing substandard houses, building new affordable homes or rehabilitating existing homes to make them safe, decent and affordable.
- The City will support housing programs that assist buyers with credit counseling, homebuyer education, etc.

## **HOME/American Dream Down Payment Initiative (ADDI)**

### **Forms of Investment of HOME Funds**

The forms of investment anticipated to be used in HOME-assisted programs and projects are among those specified in the HOME regulations (24 CFR 92.205(b)). The typical form may include subsidies and grants.

### **Resale/Recapture Guidelines for HOME-Assisted Homebuyer Activities**

The City uses HOME funds for activities that provide direct assistance to homebuyers, such as subsidies, down payment and closing costs. The City also uses HOME funds for rehabilitating homeowner substandard houses. The City has developed a deed of trust conforming to the HOME regulations for use in our rehabilitation grant programs for homeowners and in our new construction program for homebuyers. The City established guidelines for HOME-Assisted Homebuyer activities selecting the recapture option. The City forgives the direct HOME subsidy pro-rata over the affordability period. Even though it is not required, we have a recapture option for our homeowner rehabilitation activity, also.

### **Use of HOME for Multi-Family Rehabilitation Refinancing**

Not applicable. The City does not anticipate any use of HOME funds to refinance existing debt secured by multifamily housing that is being rehabilitated with HOME funds.

### **American Dream Downpayment Initiative (ADDI) Funds**

Not applicable. The City does not anticipate receiving any ADDI funds.

## **HOMELESS**

### **SPECIFIC HOMELESS PREVENTION ELEMENTS**

\*Please also refer to the Homeless Needs Table in the Needs.xls workbook.

The North Little Rock Community Development Agency (CDA) does not receive funds that are directly aimed at Homeless Prevention. However, CDA is involved in and supports different programs that are aimed at this specific cause. The Community Development Agency is a member of the Central Arkansas Team Care for the Homeless (CATCH) Continuum of Care. The Director of CDA serves on the board of CATCH. We meet monthly to discuss the homeless services of the region and identify ways to alleviate the problems of the homeless



populations through services, etc. CATCH also is responsible for the Point-in-time count each year and participates in a Homeless Conference annually.

CDA does provide financial support to different nonprofit organizations that provide services to the homeless or those in risk of being homeless.

## COMMUNITY DEVELOPMENT

### Priority Non-Housing Community Development Needs

While the City has placed primary emphasis on housing development, there are many other non-housing priority community development needs that require attention and that will benefit from CDBG assistance. The *Community Development* section of the Five Year Consolidated Plan provides a full presentation of these needs, which are briefly summarized here.

The City's priority community development needs can be placed into three general areas: (1) public facilities and improvements, (2) economic development, and (3) human services. The identified needs are:

- Infrastructure Improvements - These include improvements to such components as curb, gutter, sidewalk, drainage and lighting.
- Transportation Improvements – These include improvements to such components as streets.
- Economic Development – These include improvements to the economic base of the City by attracting, expanding and retaining employment opportunities.
- Aging Issues – The average age of the community continues to increase, with the most senior groups facing home, health and other services needs.
- At-risk Children – Providing after school programs for children.

Planned CDBG funds will be distributed among the various activities as follows:

• Salvation Army	\$ 13,500
• CareLink	\$ 30,000
• Butterfly Community Ministries	\$ 13,000
• Pulaski Technical College	\$ 13,500
• North Little Rock Boys & Girls Club	\$ 50,000
• Infrastructure Improvements	\$340,000
• Administration	\$150,446
• Handicap Ramp Program	<u>\$ 1,783</u>
Total FY 1011 Community Development Funds	\$612,229

## **Long- and Short-Term Community Development Objectives**

The City's long-term priorities and objectives for the five-year period are covered in the Five Year Consolidated Plan in the Executive Summary under Summary of Goals and Outcome Expectations.

### **Anti-Poverty Strategy**

As noted in the *Antipoverty Strategy* section of the Five Year Consolidated Plan, the City can most effectively fight poverty over the long term by:

- Promoting Economic Development, especially job intensive industries;
- Building the tax base so that basic city services and "safety net" services can be provided to all;
- Helping less affluent citizens purchase a home in a neighborhood where housing values are likely to increase;
- Ensuring that problem properties are reduced thereby preserving the value of neighborhood property;
- Homebuyer counseling and down payment assistance for low- and moderate-income first-time homebuyers; and,
- Thriving for better day care, pre-school, after-school and public education systems.

## **NON-HOMELESS SPECIAL NEEDS HOUSING**

### **Non-Homeless Special Needs**

\*Please also refer to the Non-homeless Special Needs Table in the Needs.xls workbook.

### **Priorities and Objectives**

The priorities and objectives established by the City for the entire five-year period covered by our Five Year Consolidated Plan are detailed in the Five Year Consolidated Plan in the Executive Summary under Summary of Goals and Outcome Expectations. For the FY 2011 period, special needs will be addressed under the following priorities and objectives:

- Provide rehabilitation assistance and emergency repairs for approximately 20 units of owner-occupied housing, including modifications to assist the elderly, disabled and other persons with special needs.
- Provide assistance to approximately 6 owner-occupied and rental-occupied units to install handicap ramps and railings.
- Provide assistance to approximately 30 elderly, low-income persons through the Meals on Wheels program.

### **Use of Available Resources**

The City anticipates that \$93,000 in CDBG funds will be committed to the programs above specifically targeting special needs. Of this amount, \$60,000 is directed to the indicated housing services, \$3,000 to the handicap ramp program and \$30,000 is directed to providing meals.

<b>2011 ANNUAL ACTION PLAN</b>	
<b>Activities</b>	<b>Amount</b>
Ward I – Chandler Street from 16 <sup>th</sup> to 18 <sup>th</sup> Streets – Drainage and Street Improvement plus Sidewalks – Construction Phase	\$ 85,000
Ward II – 9 <sup>th</sup> Street from “G” to “I” Streets – Drainage and Street Improvement plus Sidewalks	85,000
Ward III – 47 <sup>th</sup> Street Drainage Improvement Project – Phase II	85,000
Ward IV – Spriggs Road beginning at Remount Road – Drainage and Street Improvement plus Sidewalks	85,000
Administration and Planning	150,446
Rehabilitation – CDBG – Owner-Occupied Emergency Grants	120,000
Handicap Ramps	1,783
Salvation Army – Exterior Security Lighting, Repave Basketball Court & Repair Fence, Install Basketball Goals and Nets	13,500
CareLink – Meals on Wheels Program	30,000
Butterfly Community Ministries – Capital Improvements to building for a computer lab	13,000
Pulaski Technical College – Renovation of office space to provide a gathering place for pre-college preparation classes and privacy when speaking to administrative staff for Veterans	13,500
North Little Rock Boys/Girls Club – The Positive Place for Kids Program	50,000
Habitat for Humanity – First-time homebuyer subsidies	20,000
Subtotal	\$752,229
HOME Program – Rehabilitation of Owner-Occupied units and New Affordable Housing	400,016
<b>TOTAL</b>	<b>\$1,152,245</b>

**Denotes Public Service Activities in the amount of \$100,000**

## **APPENDIX A**

# CITIZEN PARTICIPATION PLAN for Funding Proposals

Community Development Agency  
116 Main Street  
North Little Rock, AR 72114  
Phone: 501-340-5342  
Fax: 501-340-5345  
Web Site: [northlittlerock.ar.gov](http://northlittlerock.ar.gov)

Effective Date: January 1, 2011

## **PURPOSE OF CITIZEN PARTICIPATION PLAN**

This Citizen Participation Plan (CPP) sets forth the City of North Little Rock's policies and procedures for citizen participation for the use of Community Development Block Grants (CDBG) and HOME Investment Partnership Act (HOME) funds. The Citizen Participation Plan provides an opportunity for the community to work in partnership with the City to identify needs and to allocate CDBG and HOME funds and ensures continuity of citizen involvement in the planning, development, implementation and assessment of programs funded through the Community Development Agency.

## **PUBLIC HEARINGS**

The Community Development Agency will hold at least two public hearings prior to the submission of the annual application for federal funds. All notices will be published in the local newspaper at least five (5) days in advance of the meeting date and will encourage the participation by the residents of the City. The citizen participation process is designed to encourage all citizens, including persons of low income, persons of color, non-English speaking residents, and those with mobility, visual, hearing impairments or other disabilities to participate in determining housing and community development needs within their communities.

Notice of public hearings will be mailed to all persons who have requested to be placed on the citizen participation mailing list and to presidents of neighborhood associations.

## **PROGRAM YEAR AND PLANNING PROCESS**

The local program year for all affected housing and community development programs begins on January 1 and ends on December 31 of each year. The Five Year Consolidated Plan and annual updates must be submitted to HUD no later than 45 days before the start of the program year or by November 15<sup>th</sup> of each year. Prior to submission of the Consolidated Plan and annual updates, the following steps will be taken:

- Obtain citizen input on the development of the Five Year Consolidated Plan and the City's Annual Action Plan;
- Provide information on the purpose and amounts of the different entitlement grant programs and other resources anticipated and receive

- public comment on the allocation of resources among those programs; and,
- Obtain information regarding fair housing concerns, affordable housing concerns, and related housing issues.

## ACCESS TO PARTICIPATION

### **Access to Records**

The City of North Little Rock shall provide citizens, public agencies, and other interested parties with reasonable and timely access to information and records relating to the Consolidated Plan and the City's use of assistance under the CDBG and HOME Programs.

Copies of the adopted Consolidated Plan, adopted substantial amendments, and performance reports, as well as information regarding use of funds and other program information will be maintained by the City of North Little Rock's Community Development Agency program staff and available to the public upon request.

The public may access these materials by contacting the City of North Little Rock Community Development Agency, 116 Main Street, North Little Rock, AR 72114, telephone number (501)340-5342, between 8:00 a.m. to 4:30 p.m., Monday through Friday. Reasonable accommodations for persons with disabilities will be made upon request.

### **Access for Persons with Disabilities**

Public hearings and meetings are held in locations accessible to the mobility impaired. Accommodations will be made for hearing impaired and persons with disabilities upon request. Arrangements for access to visual or hearing impaired persons may be made by contacting the North Little Rock Community Development Agency, (501)340-5342, at least 48 hours in advance of the meeting for which assistance is desired.

The City will provide for, and encourage, citizen participation emphasizing the involvement of minorities, non-English speaking persons and persons with disabilities as well as residents of public and assisted housing and by other low-income residents in areas where housing and community development funds may be spent.

### **Language Barriers**

Transition of oral communications or written materials into other languages is not provided. When staff is made aware that persons are non-English speaking and

desire information pertaining to community development and housing programs, or wish to participate in hearings or other public meetings, staff shall initiate procedures to provide translation services. Requests should be directed to the North Little Rock Community Development Agency, 116 Main Street, North Little Rock, AR at least 48 hours in advance of the meeting for which assistance is desired.

## CONSOLIDATED PLAN (FIVE-YEAR STRATEGY & ANNUAL ACTION PLAN)

In developing the Consolidated Plan and annual updates, the City of North Little Rock is guided by two leading principles:

1. **Consumer Service:** focus program efforts on the most critical needs.
2. **Comprehensive Approach:** achieve empowerment of individuals and families while ensuring long economic independence.

Inherent in these principles is extensive, relevant, and ongoing citizen participation. The City of North Little Rock, believes it is essential to have widespread, meaningful participation throughout the planning process to ensure genuine community “ownership” of the Plan.

The Consolidated Plan consists of three parts: the needs assessment, housing and community development strategic plan and an action plan. Commonly, known as the Consolidated Plan, the needs assessment and housing and community development strategic plan are updated every five years. The action plan is updated annually, reflecting annual CDBG and HOME funding allocations.

The Consolidated Plan identifies the housing and community development needs in the City, prioritize the needs for funding, and prescribe a comprehensive strategy for addressing the needs. To maintain relevance, an annual One-Year Action Plan is developed which included the following elements:

- Dollar amounts proposed for each activity;
- A description and location of each activity;
- The entity responsible for implementation of each activity; and,
- Time frame for each activity.

In all cases, the Consolidated Plan and Action Plan seek to minimize the displacement of residents from their homes or places of business.

## ADOPTION OF THE FIVE YEAR CONSOLIDATED PLAN & ANNUAL ACTION PLAN



The following procedures will ensure that all citizens will have a chance to influence the final Plan. Specifically, the City will:

1. Publish a notice announcing the 30-day public comment period and public hearing on the Consolidated Plan, and Action Plan. The notice will be published in the local newspaper and include a brief summary of the

Consolidated Plan and Action Plan that describes the contents and purpose and a list of the locations where copies of the Plan may be examined. The notice will be published at least five days prior to the public hearing.

2. The Consolidated Plan and Action Plan will be available for public view at the following locations:
  - North Little Rock City Hall (300 Main Street)
  - Community Development Agency (116 Main Street)

Upon request, the Consolidated Plan and Action Plan will be made accessible to any person with disabilities.

3. The City Council will conduct a public hearing on the Consolidated Plan and Action Plan. The Consolidated Plan and Action Plan will be adopted upon a majority vote of the City of North Little Rock City Council.

## AMENDMENT OF THE CONSOLIDATED PLAN AND ACTION PLAN

The City may amend the adopted Consolidated Plan and Action Plan. The following outlines the criteria and procedures to be used when amending the Consolidated Plan and Action Plan.

### **Substantial Amendment Criteria**

Five Year Consolidated Plan and Annual Action Plan – The City will amend its approved Five Year Consolidated Plan and/or Annual Action Plan whenever a decision is made to propose a substantial change in allocation priorities. For the purpose of the Consolidated Plan and Annual Action Plan, a “substantial change” will constitute a cumulative change equal to or in excess of 25% of the City’s CDBG or HOME entitlement for a program year.

Changes in funding priority not amounting to more than 25% of a program year will not be considered a substantial change to the Consolidated Plan; no formal amendment to the Consolidated Plan requiring public review and comment will be warranted. (For example, an amendment to the Consolidated Plan is needed if the Five Year Consolidated Plan identifies only a low priority need for historic

preservation, but during the five-year timeframe the City decides to establish a CDBG-funded historic preservation program that amounts to more than 25% of the City's annual allocation.)

Annual Action Plan – The City will amend its approved Action Plan whenever one of the following decisions is made:

1. To carry out an activity not previously described in the Action Plan;
2. To cancel an activity previously described in the Action Plan unless the subrecipient was not able to obtain other funds needed to carry out the activity;
3. To substantially change the purpose, scope, location, or beneficiaries of an activity.

Changes in funding for an existing activity (project) not amounting to more than 25% of a program year will not be considered a substantial change to the Action Plan; no formal amendment to the Action Plan requiring public review and comment will be warranted. Any funds remaining after the completion of a project may be transferred to other existing projects if approved by the City Council.

#### Amendment Process

The following procedures will ensure that all citizens will have a chance to comment on the proposed amendment to the Five Year Consolidated Plan and Action Plan.

1. Publish a notice of the 30-day public comment period on the proposed amendment to the adopted Consolidated Plan and/or Annual Action Plan. The notice will be published in the local newspaper and include a summary of the amendment and where copies of the proposed amendment may be examined.
2. The proposed amendment will be available for public review at the following location:
  - Community Development Agency (116 Main Street)
3. Approval of amendment by the City Council.
4. The City will consider any comments or views of citizens received in writing, or orally, before adopting a substantial amendment to the Consolidated Plan and/or Annual Action Plan.
5. A copy of the approved amendment will be sent to the Little Rock Field Office of the U.S. Department of Housing and Urban Development.

## CONSOLIDATED ANNUAL PERFORMANCE & EVALUATION REPORT (CAPER)

The Consolidated Annual Performance and Evaluation Report (CAPER) details the accomplishments of the Consolidated Plan and the Action Plan. The following procedures will ensure that all citizens will have a chance to comment on the CAPER.

1. A notice of the 15-day public comment period will be published on the CAPER. The notice will be published in the local newspaper. The notice will include the location at which the CAPER can be reviewed.
2. The CAPER will be available for public review at the following location:

- Community Development Agency (116 Mains Street)

Upon request, the CAPER will be made accessible to any person with disabilities.

3. A summary of citizen comments will be attached to the CAPER.
4. After the 15 day comment period, the CAPER will be submitted to the Little Rock Field Office of the U.S. Department of Housing and Urban Development on or about March 15 of each year.

## TECHNICAL ASSISTANCE

Upon request, staff will provide technical assistance to groups representing extremely-low, low- and moderate-income persons to develop funding requests for CDBG and HOME eligible activities. Technical assistance will be provided as follows:

1. Answer, in writing or verbally, all inquiries received from citizens or representative groups relating to funding requests.
2. Meet with groups or individuals as appropriate, to assist in identifying specific needs and to assist in preparing request/application for assistance.
3. Provide bi-lingual translation on as needed basis.

## ASSURANCES

The City of North Little Rock assures that the most diligent effort will be made to comply with the process and procedures outlined in this Citizen Participation Plan.